

EXHIBIT 7A

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MICHAEL COREY JENKINS, et al.,

Plaintiffs,

Civil Action

vs.

No. 3:23-cv-374-DPJ-FKB

RANKIN COUNTY, MISSISSIPPI, et al.,

Defendants.



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STEVEN N. GODFREY

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MONDAY, NOVEMBER 11, 2024
10:11 A.M.

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6 to 9

<p>1 DEPOSITION OF 2 STEVEN N. GODFREY 3 TAKEN ON 4 MONDAY, NOVEMBER 11, 2024 5 10:11 A.M. 6 7 THE REPORTER: So we are on record. The 8 time now is 10:11 a.m., and Mr. Godfrey, may I get 9 you to raise your right hand, please? 10 MR. GODFREY: Yes, ma'am. 11 THE REPORTER: Do you affirm under penalty 12 of perjury that the testimony you're about to give 13 will be the truth, the whole truth and nothing but 14 the truth? 15 THE DEPONENT: I do, ma'am. 16 THE REPORTER: Thank you. All right. 17 Will each attorney please state your name and whom 18 you represent for the record? 19 MR. SHABAZZ: Okay. My name is Attorney 20 Malik Shabazz, S-H-A-B-A-Z-Z, and I'm an attorney 21 for the Plaintiff in this matter. 22 MR. WALKER: Trent Walker, attorney for 23 the Plaintiffs in this matter. 24 MR. DARE: Jason Dare. I am representing 25 Rankin County and Sheriff Bryan Bailey in this</p>	<p>Page 6</p> <p>1 A. Yes, sir. 2 Q. And straightforward, so that you can 3 understand my questions. I'll speak as slowly as I 4 can. 5 A. Yes, sir. 6 Q. Then I'm going to wait and receive your 7 answers. 8 A. Understood. 9 Q. If there's anything that I state to you 10 that you can't understand or that's not clear, I'd 11 like you to just tell it to me, because I can repeat 12 it again. And so that we get an accurate recording 13 of the record, I'll wait til you finish your answers 14 and -- so we can be clear. 15 A. Yes, sir. 16 Q. If you need a -- if you need a break at 17 any time, I want you to just let me know. Now is 18 there anything that would impede you from 19 participating in this deposition, any -- any 20 medication or physical condition that might affect 21 your ability to answer these questions? 22 A. Not to the best of my knowledge, sir. 23 Q. Okay. Now in preparation for this 24 deposition, did you prepare with your attorney? 25 A. We met. Yes, sir.</p>
<p>1 matter. 2 THE REPORTER: All right, Attorney. You 3 may proceed. 4 STEVEN N. GODFREY, having been first duly affirmed 5 to tell the truth, was examined, and testified as 6 follows: 7 EXAMINATION 8 BY MR. SHABAZZ: 9 Q. Okay. Good morning, Mr. Godfrey. 10 A. Good morning, sir. 11 Q. Okay. I am attorney for the Plaintiff in 12 this matter. 13 A. Yes, sir. 14 Q. And Attorney Trent Walker. Michael 15 Jenkins and Eddie Parker. 16 A. Yes, sir. 17 Q. This is a civil rights matter brought 18 against Rankin County, Sheriff Bryan Bailey and six 19 other deputies that were involved in the incident of 20 January 24th, 2023. 21 A. Yes, sir. 22 Q. Okay? 23 A. Yes, sir. 24 Q. Okay. I'm going to speak as clearly as I 25 can to you.</p>	<p>Page 7</p> <p>1 Q. Okay. And did you review any documents 2 for this deposition? 3 A. No, sir. 4 Q. Okay. Now I want to go over, start with 5 your education. What's your educational background? 6 A. I graduated in 1975 from Georgia Southern 7 College at that time, which is now Georgia Southern 8 University. That's the extent of my -- well, I'm 9 sorry. Probably 15 years ago I took up, I had 10 thought I might want to get a master's from the 11 University of Mississippi, possibly to teach after I 12 retired from the FBI. I just never finished it up. 13 So I have a few hours of graduate work. 14 Q. Okay. 15 A. That's formal education. I do have, of 16 course, certifications from various law enforcement 17 agencies. 18 Q. Okay. So where is -- what's the farthest 19 you formally went in your education? What's the 20 furthest that you went? 21 A. One year of grad school. 22 Q. One year of grad school? 23 A. Yes, sir. 24 Q. Okay. And what was your first law 25 enforcement position?</p>
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10 to 13

<p style="text-align: right;">Page 10</p> <p>1 A. 1975, after graduating for college, I went 2 to work for the BIBB, B-I-B-B County Sheriff's 3 Office in Macon, M-A-C-O-N, Georgia. Of course, all 4 hired as start in the jail, and you work your way 5 through the dispatching into the road. 6 I worked there from 1975 to 1981. In 7 1981, I applied to and was hired by the Georgia 8 Bureau of Investigation as a special agent for them. 9 I worked for them just under three years. In 1984, 10 June 4th of 1984, I was sworn into the Federal 11 Bureau of Investigation as a special agent trainee. 12 I completed the FBI Academy, Quantico, 13 Virginia, and then was assigned to field work. I 14 left the -- I left the FBI in 2010, May 31st of 15 2010, as I aged out at 57. After that, worked as -- 16 I did background investigations for the FBI on a 17 contract basis. I also worked for the Mississippi 18 Bureau of Investigation for a period of 18 to 24 19 months on cold case homicides as a contract 20 investigator. And then started working part-time at 21 -- 22 Q. Slow down for one second. Slow down for 23 one second. 24 A. Yes, sir. 25 Q. Let's back up for a minute.</p>	<p style="text-align: right;">Page 12</p> <p>1 one guy who happened to be a former trooper. So I 2 kind of knew that I wouldn't be retained if they had 3 budget cutbacks. 4 Q. Okay. Prior to the MBI, when you -- when 5 you were with the FBI prior to 2010, why did -- how 6 did you end your employment there? 7 A. I aged out. 57, mandatory retirement. 8 Q. Aged out. Okay. And then you went on 9 with the MBI for 18 months? 10 A. Yeah, close to about. 11 Q. Okay. What happened -- and then you say 12 the contract ended? 13 A. Yes, sir. 14 Q. And what happened after that? 15 A. I still was doing some background 16 investigations for the FBI, but I also went out to 17 Rankin County. They had asked me to come out there. 18 Q. Okay. What year was that? 19 A. Give me a chance to do some month. 20 Q. What month -- what month -- what month and 21 year was that? 22 A. I think it was in February of 2012. 23 Q. Now when you say "Rankin County asked you 24 to come out there," who was that in Rankin County 25 that asked you to come out there?</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Yes, sir. Sorry. 2 Q. You said you worked for the MBI starting 3 in what year? 4 A. That would have been -- I retired in 2010. 5 Possibly maybe the beginning of 2011. 6 Q. Okay. And what work did you do at the 7 MBI? 8 A. They had a federal grant to work cold case 9 homicides. 10 Q. Uh-huh. 11 A. And so we were working cold case homicides 12 around the state of Mississippi. 13 Q. Okay. And you worked for them for one 14 year? 15 A. No. About 18 months, and again it was -- 16 it was a contract, so I just worked and then I think 17 they lost funding for the contract and cut back. 18 And so I left there, and that's when I went to work 19 for the Sheriff's Office. I'd actually been working 20 with them part-time also for a few months. 21 Q. Okay. So you say you left at the end of 22 the MBI. You left because the contract ended? 23 A. Yeah. That's what I was told, yes. The 24 contract had -- they didn't get the funding or 25 something along those lines. So they kept, I think,</p>	<p style="text-align: right;">Page 13</p> <p>1 A. Bryan Bailey, the Sheriff. 2 Q. Bryan Bailey. Now when did Bryan Bailey - 3 - when did Bryan Bailey become the Sheriff at Rankin 4 County? 5 A. Counsel, do you know? It was before that. 6 MR. DARE: You can testify as to -- as to 7 what you know. I mean I can represent to you that 8 the roles and records would reflect that Bryan 9 Bailey first took office in January of 2012. 10 THE DEPONENT: I thought it was his first 11 term. That was his first term. He had been 12 Undersheriff before then. 13 BY MR. SHABAZZ: 14 Q. Okay. So Bryan Bailey -- okay. You said 15 that Bryan Bailey asked you to come to Rankin? 16 A. Yes. I'd been talking to Bryan for a 17 while. I knew Bryan because I had seen him at the 18 National Academy when I was with the FBI. 19 Q. Okay. So when did you -- when did you 20 first meet Bryan Bailey? 21 A. Ooh. This was a WAG, boss, just a wild 22 ass guess. Maybe three years before that. As part 23 of what I did with the FBI was liaison with local 24 law enforcement. So I knew a lot of the guys 25 around. I lived in Rankin County.</p>

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14 to 17

<p style="text-align: right;">Page 14</p> <p>1 I knew who he was. Went to chiefs 2 conferences, sheriffs conferences for several years. 3 That was part of my job with the FBI, was the 4 training coordinator, the National Academy 5 coordinator. 6 Q. Okay. So what position was Bryan Bailey 7 before he became Sheriff? 8 A. Undersheriff. 9 Q. Okay. 10 A. He was the Undersheriff when I sent him to 11 the National Academy. 12 Q. When you sent him to the National Academy? 13 A. When the FBI sent him. When I say "me," I 14 was the one was running that program at the time. 15 Yep. I should be -- 16 Q. All right. You've given me some 17 information, but at the outset of your law 18 enforcement career, can you describe the training 19 that you received? 20 A. I started in '75 and you had something 21 like 18 to 24 months to be certified. So I was sent 22 to post-training Georgia in 1977, I think. 23 Q. Okay. And after that, your training? 24 A. You go to in-services enough. I went to a 25 DUI and toxicological school. I went -- again,</p>	<p style="text-align: right;">Page 16</p> <p>1 A. 16 weeks -- 16 weeks in the FBI Academy. 2 Q. Okay. Can you describe the training that 3 you received there? 4 A. Everything. Physical training, firearms 5 training, defensive tactics training, interview and 6 interrogation, informant development. I'm sure I'm 7 leaving something out. But 16 weeks, the whole 8 time. 9 Q. Okay. Anything else other than those 10 categories at the FBI? 11 A. At the Academy? I'm sure -- I'm sure I'm 12 overlooking something, sir. Yeah, I think -- 13 Q. Okay. Did you have a copy of your 14 training records from that period? 15 A. No. No, sir. 16 Q. Okay. After that, you said you went to -- 17 you were at the MBI; correct? 18 A. Yes. 19 Q. Now what training did you receive at the 20 MBI? 21 A. No training from MBI. Again I was -- sir? 22 Q. Okay. What were you going to say? 23 A. I just said I was cold case homicide, so 24 there -- there was really nothing to be trained on. 25 Just when I tried to work up some old cases.</p>
<p style="text-align: right;">Page 15</p> <p>1 you're asking me to remember back 40, 45 years. I 2 occasionally go to classes that you'd want to go to, 3 interview and interrogation, stuff along those 4 lines. Of course -- 5 Q. Okay. 6 A. -- when I -- when I left the Sheriff's 7 Office, I went to work at the Georgia Bureau of 8 Investigation. Had to go to their basic school, 9 which I think was eight weeks at that time. 10 Q. Okay. What were you trained in? 11 A. Just basic investigative techniques. 12 Okay. Their version of post peace officer standing 13 and training. 14 Q. I understand. 15 A. Yes sir. 16 Q. Okay. After that, what did your training 17 consist of? I think you hit -- you went to the GBI 18 in '84; correct? 19 A. No, sir. That was the FBI in '84. I went 20 to the GBI in '81. 21 Q. '81? 22 A. Yes, sir. 23 Q. All right. So when you went to the FBI, 24 what was your -- what level of training did you 25 receive? What kind of training?</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. Okay, at the MBI. And then that brings us 2 up to Rankin County; is that correct? 3 A. Yes. Yes, sir. 4 Q. Okay. Now what were you -- what were you 5 recruited to do at Rankin County by Sheriff Bailey? 6 A. I had run the SWAT team for the FBI, the 7 local office team. I had -- was a tactical 8 instructor, a firearms instructor, things along 9 those lines. So I was brought over to -- to one is 10 the SRT team, the Special Response Team. I was 11 brought over to run the firearms program and 12 basically help with training and, of course, I 13 pretty much did anything he wanted me to do. 14 In fact, if somebody needed help on an 15 interview, I was glad to do that. Pretty much just 16 anything they wanted me to do. 17 Q. Okay, okay. So you were brought in to do 18 SWAT, firearms and what positions -- how long did 19 you stay at Rankin County? 20 A. Ten years. 21 Q. How long did you -- 22 A. About at ten years, yes sir. 23 Q. Okay. So you left in -- you left in what 24 year? When did you leave? 25 A. Last November.</p>

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18 to 21

<p style="text-align: right;">Page 18</p> <p>1 Q. November of 2023?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. That seems to be about 13 years; is</p> <p>4 that correct?</p> <p>5 A. No, sir. I didn't go to work immediately</p> <p>6 for Rankin again. I started at MBI, and I was doing</p> <p>7 --</p> <p>8 Q. February 2012?</p> <p>9 A. About 2012, but at first I was part-time</p> <p>10 over there. So I wasn't -- that was not accruing</p> <p>11 PERS time, retirement qualifications.</p> <p>12 So what I did was after I left MBI and I</p> <p>13 stopped doing Bibbs, because I got tired of fooling</p> <p>14 with federal rules and regulations, I went out there</p> <p>15 as a -- I was designated full-time less than 40</p> <p>16 hours. That I guess a PERS designator. So I could</p> <p>17 -- that qualified me for retirement credits so --</p> <p>18 Q. Okay. When did you come to full time at</p> <p>19 Rankin County?</p> <p>20 A. Sometimes in 2012 maybe, 2013. I accrued</p> <p>21 enough -- I think you have to have ten hours at --</p> <p>22 nine or ten to retire from PERS. And so that's --</p> <p>23 as soon as I got the time. You've got to contact</p> <p>24 Personnel in Rankin, and they could tell you when I</p> <p>25 -- all these different things.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. They did not have one?</p> <p>2 A. To the best of my recollection.</p> <p>3 Q. They did not have an internal</p> <p>4 investigation department -- Rankin did not have an</p> <p>5 Internal Affairs Department during the time of your</p> <p>6 tenure in Rankin, is that right?</p> <p>7 A. Not a department, no sir. Nobody assigned</p> <p>8 full-time to that position, no.</p> <p>9 Q. Okay. So and -- and so just -- when were</p> <p>10 you able to participate in certain investigations?</p> <p>11 A. When I asked to by the Sheriff.</p> <p>12 Q. Okay. And when were those occasions?</p> <p>13 A. Once again you asked this. It's over ten</p> <p>14 years, and it's been a while. I've worked several,</p> <p>15 and most of them were just the Sheriff would say can</p> <p>16 you look into this. There's been an allegation of</p> <p>17 this. Can you look into it? I would do a short</p> <p>18 investigation, put some interviews together and I</p> <p>19 would get the package back to the Sheriff.</p> <p>20 Q. Okay. So is it fair to say that your</p> <p>21 assignment was not formal in that regard but --</p> <p>22 A. Yeah, yeah. That was probably be a good</p> <p>23 statement. Not formal, but I was asked to do them</p> <p>24 on occasion.</p> <p>25 Q. Okay. And do you recall the</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. Okay. Now so you said you came in to help</p> <p>2 with the SWAT Department?</p> <p>3 A. The tactical team, yes sir.</p> <p>4 Q. And with firearms?</p> <p>5 A. Yes, sir. Running the program.</p> <p>6 Q. What other position did you hold in Rankin</p> <p>7 County?</p> <p>8 A. I think if you're looking for a title,</p> <p>9 it's probably Training Director, which is kind of</p> <p>10 misnomer. I mean there's really -- there's no</p> <p>11 Academy, so to speak. There is a -- they have an</p> <p>12 Academy there that's basically they run a program at</p> <p>13 Rankin for -- reserve, reserve officer program.</p> <p>14 I didn't participate in that. That was</p> <p>15 already up and running by other people there, so I</p> <p>16 didn't get involved in it and I helped a little bit</p> <p>17 on Internal Affairs investigations. Not many, just</p> <p>18 one. They would occasionally ask me to look into</p> <p>19 some allegation.</p> <p>20 Q. Okay. So did you ever serve as an</p> <p>21 Internal Affairs officer for Rankin County?</p> <p>22 A. Again, I would do some. I wouldn't -- I</p> <p>23 wouldn't say I was the Internal Affairs</p> <p>24 investigator. They really at the time didn't have</p> <p>25 one.</p>	<p style="text-align: right;">Page 21</p> <p>1 investigations that you did participate in?</p> <p>2 A. A few.</p> <p>3 Q. Do you recall those investigations?</p> <p>4 A. Sir?</p> <p>5 Q. Do you recall those investigations?</p> <p>6 A. A few of them. You would have to ask me</p> <p>7 specifics. Generally, I remember one I did on a</p> <p>8 correctional officer who was accused of having sex</p> <p>9 with a trustee one time, and another one --</p> <p>10 Q. Do you remember that officer's name?</p> <p>11 A. No. That was when I first started there.</p> <p>12 That was probably back in about 2012. He was a</p> <p>13 sergeant in the jail is all I can tell you.</p> <p>14 Q. Do you remember the deputy's name?</p> <p>15 A. It was a sergeant in the jail. That's all</p> <p>16 I can tell you.</p> <p>17 Q. Okay. And about how many, just because it</p> <p>18 doesn't seem to be that many --</p> <p>19 A. Right.</p> <p>20 Q. But in your career, how many</p> <p>21 investigations did you participate in?</p> <p>22 A. Eight, ten. Some of them were just quick,</p> <p>23 you know, turnaround things --</p> <p>24 Q. Okay. Okay. I'm sorry.</p> <p>25 A. No, that's fine.</p>

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34 to 37

<p style="text-align: right;">Page 34</p> <p>1 the persons that were joining the SWAT team? Was 2 there any investigation into their past conduct or 3 misconduct? 4 A. Again, it's a small department. Everybody 5 knows everybody. You know. 6 Q. Okay. So the answer would be no? 7 A. If you -- if you choose to say no. 8 Everybody knew everybody. I mean that is an 9 investigation. 10 Q. Okay. Now when you say "everybody knew 11 anybody," is that to say that -- that you knew 12 Christian Dedmon, Middleton, McAlpin, Opdyke and 13 Elward, that you knew all about them at the time 14 they were allowed to join the SWAT team? 15 A. No. That's probably no. Absolutely I 16 don't know everything about them. I don't know 17 everything about anybody. I observe them in their 18 work and I talk to people who work with them, knew 19 whether they were a good worker or not. 20 Q. Okay. But I mean you just earlier said 21 that you said it's a small department, and everybody 22 -- seems to be you said everybody knows everything 23 about everybody? 24 A. No, sir. I didn't say everybody knows 25 everything. I said everybody knows these guys. I</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Now you're getting kind of overly broad 2 here. You want to go in and talk about each deputy 3 or -- I knew these -- I knew all these guys in the 4 context of me working with them, being in training 5 with them and being around the office with them. I 6 didn't go out at night work with any of them, 7 anything along those lines. 8 Q. Okay. Now did you do -- did you do 9 investigations on the SWAT team? While you were a 10 member -- while you were serving in -- as part of 11 the leadership capacity on the SWAT team -- 12 A. Yes, sir. 13 Q. -- did you do investigations on the 14 conduct of the officers while you were on the SWAT 15 team? 16 A. No, sir. That wouldn't be appropriate. 17 Q. Can you explain? 18 A. If I'm out on a situation with the 19 deputies and something happens, I'm not an impartial 20 arbiter. I am involved in it. So there's no way I 21 can conduct an investigation and give the appearance 22 of propriety. 23 Q. Okay. But did you -- are you saying you 24 participated in every action that the SWAT team 25 conducted?</p>
<p style="text-align: right;">Page 35</p> <p>1 don't know everything about anybody sir, not even my 2 wife. 3 Q. Okay. So, okay. So everybody knows these 4 guys. So you knew Dedmon, Middleton, McAlpin, 5 Opdyke and Elward. You knew them? 6 A. Yes, sir. 7 Q. You knew what kind of officers they were? 8 A. Yes, sir. 9 Q. Okay. And were you aware of past 10 incidents that they had been involved in, citizens, 11 past incidents that they have involved in with 12 citizens of Rankin County? 13 MR. DARE: Object to form. You can answer 14 if you know. 15 THE DEPONENT: No. Certainly, I don't 16 know every interaction they've had with people in 17 Rankin County, no. 18 BY MR. SHABAZZ: 19 Q. I'm talking about incidents where -- where 20 possible excessive force or violations of the 21 Constitutions have occurred? 22 A. No, I wouldn't say that. I didn't know 23 everything, no. 24 Q. Okay. But what -- what did you know about 25 them?</p>	<p style="text-align: right;">Page 37</p> <p>1 A. Most of them, yes sir. 2 Q. Okay. When you say "most," roughly what 3 percent? 4 A. Official operations? Almost all of them. 5 If it was -- if it was a planned operation I was 6 generally there, unless I was out of town. 7 Q. Okay. And did -- and you said that you 8 did not investigate any allegations of misconduct by 9 them while they were on the SWAT team? 10 A. No. 11 Q. Okay. 12 MR. DARE: Do you need to go off the 13 record? 14 THE DEPONENT: Sir? 15 MR. SHABAZZ: What did he say? 16 MR. DARE: I didn't say anything. 17 MR. SHABAZZ: Okay. 18 BY MR. SHABAZZ: 19 Q. Well, who was responsible -- who was 20 responsible for investigating allegations of 21 misconduct for SWAT team members? 22 A. I don't know. I didn't. 23 Q. Okay. Do you know? 24 A. Sir? 25 Q. Do you know who was responsible for</p>

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22 to 25

<p style="text-align: right;">Page 22</p> <p>1 Q. Okay. They were -- do you have 2 documentation that reflects your investigations? 3 A. Not after, no sir. I didn't keep anything 4 when I left. 5 Q. Okay. And did you participate in 6 producing documents and records of the 7 investigations that you did participate in? 8 A. I would prepare a packet and give it back 9 to the Sheriff, yes. It would mostly be -- it will 10 just be results of the interviews or anything else 11 that was involved. Again, maybe eight, ten the 12 whole time I was there. 13 Q. Okay. And you did -- you did have written 14 documentation for those eight to ten investigations 15 you did? 16 A. That would be hard to say. Again, I gave 17 everything back to the Sheriff. 18 MR. DARE: If I may, I think you are 19 asking if this witness personally has any, is that 20 right? 21 MR. SHABAZZ: No, sir. 22 MR. DARE: I want to make sure that the 23 record was clear. Can you ask that question again, 24 counsel? 25 BY MR. SHABAZZ:</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Okay. So did Rankin County in the times - 2 - in your tenure, did Rankin County have written 3 procedures for internal investigations? 4 A. I'm sure there is one in the SOP, but it's 5 just general. I couldn't quote it. 6 Q. Okay. Okay. Now you said that your -- 7 that you at time to time did internal 8 investigations; correct? 9 A. Yes, sir. Yes, sir. 10 Q. Okay. Was there an Internal Affairs 11 officer during your tenure? 12 A. I still don't think there's one full-time. 13 I think there's a guy that's assigned to do them now 14 in the Investigative Division. A lot of times what 15 would happen is a complaint would come -- again 16 speculation, would come in, an allegation against a 17 patrol deputy that was rude to a person. 18 That would just be passed to the Chief of 19 Patrol, who would handle it. It would be passed to 20 the chief investigator to handle, those type of 21 things. 22 Q. Okay. Now you -- you left -- when you 23 left Rankin County, why did you leave Rankin County? 24 A. I had enough time to retire. It was time. 25 I'm 70 years old --</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Okay. I'm just asking did he produce 2 documentation in reference to the eight to ten 3 investigations that he says he participated in? 4 A. Again, eight to ten is WAG. I did on 5 occasion, yes sir, if I thought it was necessary. 6 Q. Okay. 7 A. I'll give you a good example if I wouldn't 8 prepare a document, okay? The Sheriff would come 9 and say this person called and said this deputy did 10 something. Was ugly to them on the road, cursed at 11 or whatever. 12 If I called the person and they didn't 13 return my call, didn't answer my call or decided 14 they wanted to pursue it, didn't want to come in and 15 make full statement or anything like that, I would 16 just go back to the Sheriff and say they wouldn't 17 come in and make a statement type thing. 18 Q. Okay. So you wouldn't -- you wouldn't -- 19 would you write anything formal when that happened? 20 A. No. Generally not, no. Again, it was an 21 informal thing. I was not assigned as the Internal 22 Affairs investigation. There was no standard 23 operating procedure that I knew of how to handle an 24 Internal Affairs investigation. I just tried to 25 find out what went on and let the Sheriff know.</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. Okay. 2 A. It isn't what it used to be. 3 Q. Okay. You're familiar with the case of 4 Michael Jenkins and Eddie Parker; is that correct? 5 A. Is this the shooting? Yes, sir. Yes, 6 sir. 7 Q. Okay. Did you participate in that 8 investigation? 9 A. No, sir. 10 Q. Okay. 11 A. I did take the Garrity statements. I took 12 Garrity statements from each of them at the request 13 of counsel and the Sheriff. 14 Q. Okay. Can you describe what that is? 15 A. A Garrity statement? 16 Q. Yes. Can you describe what that is? 17 A. It's when you interview -- you interview 18 the deputy and ask him what happened. 19 Q. Okay. So you did interview each deputy in 20 the -- in the Michael Jenkins/Eddie Parker matter? 21 A. Yes, sir. 22 Q. Okay. When did you -- when did you 23 interview them? 24 A. A week later, maybe. 25 MR. DARE: And you can only testify as to</p>

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26 to 29

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1 what you specifically recall.
2 THE DEPONENT: Yeah. Maybe a week later,
3 five days later.
4 BY MR. SHABAZZ:
5 Q. Okay. And --
6 A. I don't happen to know, sir.
7 Q. Well, that's okay. But did you produce --
8 A. Yes, sir.
9 Q. -- okay. Did you produce records in
10 regards to your investigation?
11 A. The interviews, yes sir.
12 Q. Your interviews?
13 A. Yes, sir.
14 Q. Okay. And Rankin County's in possession
15 of those, those records; is that correct?
16 A. I have no idea. I would assume they
17 would.
18 Q. Okay. So exactly what did you do with
19 those deputies?
20 A. Did I do with the deputies?
21 Q. Yeah. When you --
22 A. Nothing. I had them come in, interviewed
23 them, gave the results to the Sheriff.
24 Q. Gave the results to Sheriff Bailey. Okay.
25 And you said maybe about a week or so after?

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1 A. That's a guess again. That's been several
2 years ago now, and I don't particularly remember.
3 Q. Okay. But were you asked to -- did you
4 reach any findings or conclusions or make any
5 recommendations based on your interview?
6 A. No, sir. Not my job.
7 Q. Okay. Now when you were SWAT commander,
8 you say you were a SWAT commander?
9 A. Yes, sir. I was the overall commander,
10 team leader, whatever you want to call it for the
11 SRT team, yes sir.
12 Q. Okay. What year was that?
13 A. From the time I started til the time I
14 left.
15 Q. Okay. So your entire tenure you were a
16 SWAT commander?
17 A. Yes, sir.
18 Q. Okay. Now were any of the deputies that
19 were involved in the Michael Jenkins matter --
20 A. Yes, sir.
21 Q. I'm specifically speaking of Christian
22 Dedmon, Lieutenant Middleton.
23 A. Yes, sir.
24 Q. Brett McAlpin?
25 A. No. He was not on the team. He was on

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1 the team to begin with, but he stepped off the team
2 when he became Chief Investigator.
3 Q. Okay. I'm going to ask you about each of
4 them and their involvement with the SWAT team.
5 A. Yes, sir.
6 Q. Okay. Okay. Well, let's just go down.
7 Was Dedmon a member of the SWAT team while you were
8 the commander?
9 A. Yes, sir.
10 Q. And was Middleton -- was Middleton a
11 member of the SWAT team while you were commander?
12 A. Yes, sir.
13 Q. Okay. Do you recall the years for those
14 two, when they were SWAT team members?
15 A. Middleton, I think, was on the team when I
16 got there. Dedmon was not. Dedmon tried out for
17 the team
18 after I was there, when he came over from Pearl.
19 Q. Okay. He tried out for the team. About
20 what year was that?
21 A. Anything I would tell you would be a
22 guess, sir.
23 Q. That's okay. I'm asking for your
24 recollection.
25 MR. DARE: I would only say don't

Page 29

1 speculate.
2 THE DEPONENT: Five years after I started,
3 six years. I don't know when he came from Pearl.
4 BY MR. SHABAZZ:
5 Q. Okay. Mr. McAlpin, was he a member of the
6 SWAT team?
7 A. He was -- yes sir, he was there. He was
8 on the team when I got there.
9 Q. Okay. And how long did he serve on the
10 SWAT team, McAlpin?
11 A. I think he stepped off when he became
12 Chief Investigator.
13 Q. What year was that?
14 A. I don't know, sir.
15 Q. Approximately.
16 A. Three years before. When did I leave?
17 This is '20. Maybe four years ago.
18 Q. Roughly around 2019?
19 A. I guess. Again sir, I can't answer that
20 specifically.
21 Q. That's okay.
22 A. I understand.
23 Q. That's okay.
24 A. I understand.
25 Q. We're putting some approximations here.

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30 to 33

<p style="text-align: right;">Page 30</p> <p>1 Okay. So McAlpin served on the SWAT team up til 2 about 2019; correct? 3 A. Possibly, yes sir. 4 Q. Okay. And what about Deputy Opdyke? 5 A. Yes, sir. He was on. He'd only been on a 6 couple of years, I think. 7 Q. A couple of years? 8 A. He was one of the newest members of the 9 team, yes sir. 10 Q. When you arrived? 11 A. No, sir. Before I left. 12 Q. When you left? 13 A. Yes, sir. 14 Q. Okay. Okay. Well, what about Hunter 15 Elward? 16 A. He was there. He was also on the team, 17 yes sir. 18 Q. He was a member of the SWAT team? 19 A. Yes, sir. 20 Q. And what years was he a member? 21 A. It would be about a year longer than 22 Opdyke, I think. Maybe two. 23 Q. So, okay. Maybe roughly around 2019-2020? 24 A. I guess. This is all -- should be all in 25 their personnel files.</p>	<p style="text-align: right;">Page 32</p> <p>1 qualifications -- 2 A. They certainly had to pass the firearms, 3 firearms scores. 4 Q. Okay. What else? 5 A. That was pretty much it to be -- to be 6 going to the interview and pass the interview that 7 was run by the whole team. 8 Q. Okay. And you were -- were you the person 9 to determine whether they joined the SWAT team? 10 A. No, sir. I certainly had a -- I had a say 11 in it, but it was a team decision. 12 Q. Okay. Who was that team? 13 A. The whole team. 14 Q. Okay. Which was? Which -- 15 A. The whole team. 16 Q. Okay. Who was the whole team? 17 A. Whoever was on the team at that time when 18 they tried out. Because consistent -- 19 Q. Was Sheriff Bailey a part of that team? 20 Was Sheriff Bailey a part of that team? 21 A. No. 22 Q. Okay. So who would -- who would typically 23 be a part of that team? 24 A. I'm trying to answer. It would be the SRT 25 team. The whole team would come out for the</p>
<p style="text-align: right;">Page 31</p> <p>1 Q. Okay. I think you said Dedmon had to -- 2 did you say he had to qualify for the SWAT team? 3 A. Had to try out. Yes, sir. Anybody that 4 comes in and wants to be on the team had to go 5 through a tryout. Unless you're on another team 6 that has the same standard operating procedures and 7 have been to the same schools that Rankin County 8 sends their guys to. 9 Q. Okay. And so did -- were you -- were you 10 the person that determined the qualifications of the 11 deputy to join the SWAT team? 12 A. We had come up -- basically, we had -- the 13 basic PT test was adopted from the one the FBI uses, 14 and then they do a few other things. Some team- 15 building exercises, some firearms, check their 16 firearms score, check their team-building skills, 17 and then the decision will be made mostly by the 18 whole team. 19 Q. Okay. Well, what was the PT test? 20 A. So you have to be outstanding. It's a -- 21 consists of a mile and a half run, a 40 yard spring 22 with body armor carrying a weapon, a certain amount 23 of pullups wearing body armor, a shuttle run, and 24 that was about it. 25 Q. Okay. Okay. In terms of what other</p>	<p style="text-align: right;">Page 33</p> <p>1 tryouts, observe and help put on the tryouts. We 2 would interview the candidate and then we would vote 3 on it. 4 Q. Okay. Now you listed certain criterion to 5 join the SWAT team? 6 A. That was to qualify to be interviewed, yes 7 sir. 8 Q. Qualified to be interviewed. Was there 9 any review of the deputies' performance or past 10 performance in consideration for his admission to 11 the SWAT team? 12 A. Of course. But I mean you didn't go in 13 and look at records. I mean the place is small 14 enough. You know everybody there. You know 15 everybody there, and you talk to people. 16 Most of the time, you wouldn't -- you 17 could not -- when I was there, you couldn't even 18 qualify to apply unless you had a year in, unless 19 you had some extenuating circumstance such as -- 20 such as if you came from another department and 21 you'd been on their team, you could go ahead and 22 apply. You didn't have to wait the year. 23 But if you were a new deputy, you 24 generally had to wait a year. 25 Q. Okay. Was there any investigation into</p>

1	Investigating allegations against SWAT team members?	1	Q. Okay. So you had an average of about two or three callouts per month?
2	MR. DARE: I'm going to object to the form, but you can answer if you know.	2	A. Maybe. We could go several months, excuse me just a minute. Can I get a glass or a bottle of water?
3	THE DEPONENT: No, sir. I don't ever remember us being investigated. If it was an officer-involved shooting, MBI came in and worked it.	3	MR. DARE: Yeah.
4	BY MR. SHABAZZ:	4	THE DEPONENT: Can I step away?
5	Q. Okay. But I'm saying other -- other, other allegations.	5	MR. DARE: Let's go off the record real quick.
6	A. You have to talk to the Sheriff, sir.	6	THE REPORTER: We're off record. The time now is 10:50.
7	Q. Okay. And so what was the Sheriff's role in supervising the SWAT team?	7	(WHEREUPON, a recess was taken.)
8	A. On a day-to-day basis? Not much. I generally handle the day-to-day workings of anything that the SRT team did. Of course, on any kind of emergency callout, the Sheriff was generally on scene commander. He is the Sheriff.	8	THE REPORTER: The time is 10:53, and we're back on record.
9	Q. Okay. So now on a day-to-day basis, how often -- how often did you all report to Sheriff Bailey on the actions of the SWAT team?	9	BY MR. SHABAZZ:
10	A. I'm not really clear.	10	Q. Okay. Did you say FOAC before?
11	Q. Okay. Did you tell -- what is FOAC?	11	A. Yes.
12	A. It's called FOAC. It's Field Office Administration and Communication. It was how to do Bureau paperwork. The Bureau has a very rigid -- back in my day, it had a very rigid standard.	12	Q. Okay. So it is a -- is it fair to say that in your law enforcement career, that you were -- you were not trained as an Internal Affairs investigator?
13	Q. How often did you meet with Sheriff Bailey in terms of the actions of the SWAT unit?	13	A. That would be very correct, sir.
14	A. Not many times at all. I mean again, it's flow of information. And so that was -- and that	14	Q. Okay. Now did you -- are you familiar with the case of Damien Cameron?
15	in terms of the actions of the SWAT unit?	15	A. Not by name. If you could give me a little detail.
16	Q. Okay. So now on a day-to-day basis, how often -- how often did you all report to Sheriff Bailey on the actions of the SWAT team?	16	Q. In 2021, Damien Cameron was involved in an incident with Hunter Elward and --
17	A. I'm not really clear.	17	A. I know what you're talking about.
18	Q. Okay. Did you investigate that case?	18	Q. Okay. Did you investigate that case?
19	A. Yes.	19	A. No, sir.
20	Q. Okay. Did you tell -- what is FOAC?	20	Q. Did you have any role in that case at all, in reviewing that?
21	A. It's called FOAC. It's Field Office Administration and Communication. It was how to do Bureau paperwork. The Bureau has a very rigid -- back in my day, it had a very rigid standard.	21	A. No, sir. No, sir.
22	Q. How often did you meet with Sheriff Bailey in terms of the actions of the SWAT unit?	22	Q. Did Bryan Bailey review any of those -- of those that case with you?
23	A. Not many times at all. I mean again, it's flow of information. And so that was -- and that	23	A. You'd have to ask Bryan Bailey.
24	in terms of the actions of the SWAT unit?	24	Q. Okay.
25	A. Not many times at all. I mean again, it's	25	A. I have no idea.

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42 to 45

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1 Q. Okay. So I mean if in fact Bryan Bailey
2 said that you had some role in investigating that
3 case, what would your response be?
4 A. I'd have to see the paperwork or you'd
5 have to enlighten me on it as to what I did, because
6 I do not remember it.
7 Q. You don't recall being involved in that
8 case; correct?
9 A. No sir, I do not.
10 Q. And what -- okay. Do you recall the
11 Pierre Woods matter? Do you recall Pierre Woods?
12 A. No, sir.
13 Q. Okay. Now, okay. You're not familiar
14 with the Pierre Woods matter?
15 A. No, sir. If you could give me some
16 details, I might remember an incident. I don't
17 remember names.
18 Q. I think the SWAT team -- from my
19 understanding, the SWAT team was involved in Pierre
20 Woods' case, and Pierre Woods was shot and killed?
21 A. In Pelahatchie? Yeah. Yes, sir. I was
22 on scene.
23 Q. You were on the scene in that case?
24 A. Yes, sir.
25 Q. Okay. And did you participate in -- what

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1 was your role in the -- in the investigation of what
2 happened in that matter?
3 A. Did not run anything on the investigation,
4 sir. It was a OIS. It was investigated by the
5 Mississippi Bureau of Investigation.
6 Q. Okay. One second.
7 A. Yes, sir.
8 Q. Okay. Now in terms of your knowledge, how
9 did -- how did Rankin County review the internal
10 actions of its officers, to ensure that the
11 Constitution and Rankin County Department policy
12 were being followed? How did Rankin County -- well,
13 how did they go about that?
14 A. The Sheriff handled everything. If he had
15 you do something he wanted to do, he told you.
16 Q. Okay. So you're saying that the Sheriff
17 handled all reviews of the internal actions of the
18 officers --
19 MR. DARE: Objection.
20 MR. SHABAZZ: -- to see whether or not
21 they were involved or compliant with the
22 Constitution?
23 MR. DARE: Object to form. That's not
24 what he said.
25 BY MR. SHABAZZ:

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1 Q. Okay. Well, explain that to me again, so
2 I can understand. How did -- how did Rankin County
3 review the internal actions of its officers, to
4 assure that the Constitution and department policy
5 was being followed?
6 A. I can't answer that question.
7 Q. Okay. But you said -- you can't answer
8 it?
9 A. I didn't say I wouldn't. I said I can't.
10 I don't know what the policy was, how it was
11 handled, that Rankin County handled it.
12 Q. Okay. Well, how did Bryan Bailey handle
13 it?
14 A. You'd have to ask Bryan Bailey.
15 Q. But just -- previously, you just said that
16 Bryan Bailey, Bryan Bailey handled all of that?
17 A. He is the Sheriff, sir. He supervises the
18 whole department. If the Sheriff told me to do
19 something, I did it. If he told someone else to do
20 something, I assume they did it.
21 Q. Okay. So if a deputy was accused of
22 beating a citizen, how did the Sheriff's Department
23 handle that matter?
24 A. I was never asked to interview -- conduct
25 any investigation into the beating of anyone that I

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1 can recall. So I can't tell you what was done.
2 Again, most of the time it was passed to the Chief
3 Investigator or the Chief Deputy in charge of Patrol
4 or anything along those lines.
5 Q. Okay. But there was nothing formal? You
6 don't have a -- was there a formal procedure in
7 place?
8 A. Not that I know of, sir.
9 Q. Okay. So pretty much you're saying that
10 whatever Sheriff Bailey said what happened, that's
11 what would happen? Is that what you're saying?
12 A. Yes. He is the Sheriff.
13 Q. Okay. Now when you said that -- what was
14 the role of the special investigator?
15 A. I'm not -- I'm not familiar with that term
16 "special investigator."
17 MR. WALKER: Do you mean "Chief
18 Investigator"?
19 THE DEPONENT: Chief Investigator?
20 BY MR. SHABAZZ:
21 Q. Let me look at my chart. Yeah. What was
22 the -- I'm sorry, strike that. What was the role of
23 the Chief Investigator?
24 A. He supervised investigations and the
25 investigators.

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46 to 49

<p>Page 46</p> <p>1 Q. Okay. What kind of investigations?</p> <p>2 A. Any investigation that came into the</p> <p>3 Sheriff's Office. Anything that required an</p> <p>4 investigator, to the best of my knowledge. Again, I</p> <p>5 was not --</p> <p>6 Q. And that includes -- and that includes</p> <p>7 violations of department policy?</p> <p>8 A. If the Sheriff asked him to or her to, I'm</p> <p>9 assuming.</p> <p>10 Q. And that includes any and all violations</p> <p>11 of the United States Constitution? That would be</p> <p>12 handled by the Chief Investigative Officer?</p> <p>13 A. It would be handled by whoever the Sheriff</p> <p>14 told him to.</p> <p>15 Q. Okay. So this was at the discretion of</p> <p>16 Sheriff Bailey?</p> <p>17 A. I would assume so, since he is the head of</p> <p>18 the law enforcement.</p> <p>19 Q. Okay. I want to show you something.</p> <p>20 A. Okay.</p> <p>21 MR. SHABAZZ: I'm sharing something.</p> <p>22 MR. DARE: Counsel, are you putting</p> <p>23 something up on the screen? Because I can't see it.</p> <p>24 MR. SHABAZZ: I'm about to put it up here</p> <p>25 now. I'm going to show you what's been marked as</p>	<p>Page 48</p> <p>1 MR. DARE: We don't have any -- anything</p> <p>2 marked here. And I don't mind going to making a</p> <p>3 copy for you counsel, and giving a copy to the Court</p> <p>4 Reporter. But it would easier if this flow chart,</p> <p>5 which is RC 1802 through 1805. If you'd like for</p> <p>6 that to be Exhibit 2, that's fine. Let me go make a</p> <p>7 copy and hand a copy to the witness, if that's okay.</p> <p>8 MR. SHABAZZ: That's fine. Well, let me</p> <p>9 just tell you that Exhibit 1 is going to be the</p> <p>10 Defendant's First Response to Plaintiff</p> <p>11 Interrogatories.</p> <p>12 MR. DARE: Do you have a copy?</p> <p>13 MR. SHABAZZ: Yeah. I can email it all to</p> <p>14 you right now. I can. I think you -- I can email</p> <p>15 it to you, give it to you right now, as a matter of</p> <p>16 fact.</p> <p>17 MR. DARE: And so you're going to email me</p> <p>18 what you want marked as Exhibit 1, and you want me</p> <p>19 to go print it off and then hand it to the witness?</p> <p>20 MR. SHABAZZ: Yes, sir. Let me just load</p> <p>21 it up here for you now. To --</p> <p>22 What I'm going to do is I'm just going to</p> <p>23 -- I'm going to go to some other questions. I'm</p> <p>24 just going to send this to Attorney Trent Walker.</p> <p>25 What he can do right now is just print this out, and</p>
<p>Page 47</p> <p>1 Plaintiff's Exhibit No. 2.</p> <p>2 MR. DARE: Nothing has been marked as an</p> <p>3 exhibit to this deposition. If you need something</p> <p>4 marked, we can do it. I'd ask for a copy of it, so</p> <p>5 I can look at it while you're showing it to this</p> <p>6 witness. Is that what's going to be marked as</p> <p>7 Exhibit 2?</p> <p>8 MR. WALKER: I presume so.</p> <p>9 MR. SHABAZZ: Yeah. What it is -- well, I</p> <p>10 can give it to you again. I got it from you.</p> <p>11 MR. DARE: And what is it?</p> <p>12 MR. SHABAZZ: This is your -- hold on.</p> <p>13 This is the flow chart.</p> <p>14 MR. DARE: And you want this marked as</p> <p>15 Exhibit 2 to this deposition? Counsel?</p> <p>16 THE DEPONENT: I would prefer to read this</p> <p>17 --</p> <p>18 MR. SHABAZZ: Yes.</p> <p>19 THE DEPONENT: -- hard copy than try to</p> <p>20 read it on this screen.</p> <p>21 MR. DARE: Yeah. So what is Exhibit 1?</p> <p>22 MR. WALKER: Make the notice Exhibit 1.</p> <p>23 MR. DARE: Okay.</p> <p>24 MR. SHABAZZ: And I've pre-marked this,</p> <p>25 but I went out of order.</p>	<p>Page 49</p> <p>1 then I can just come back to it, so we don't have to</p> <p>2 stop and waste a lot of time on that.</p> <p>3 MR. DARE: Attorney Walker doesn't have a</p> <p>4 printer here.</p> <p>5 MR. WALKER: Let's go off the record for a</p> <p>6 minute.</p> <p>7 THE REPORTER: Okay. We're off record.</p> <p>8 The time now is 11:03.</p> <p>9 (WHEREUPON, a recess was taken.)</p> <p>10 THE REPORTER: The time now is 11:23 a.m.,</p> <p>11 and we are back on record.</p> <p>12 MR. SHABAZZ: Okay. We're back.</p> <p>13 Plaintiff has given to the witness and opposing</p> <p>14 counsel Plaintiff's Exhibit No. 1, which is Rankin</p> <p>15 County's Response to Plaintiff's First Set of</p> <p>16 Interrogatories.</p> <p>17 (WHEREUPON, Plaintiff's Exhibit 1 was</p> <p>18 marked for identification.)</p> <p>19 MR. SHABAZZ: Exhibit 2, which is a</p> <p>20 November 20th, 2023 flow of the Rankin County</p> <p>21 Sheriff's Department, provided to us by opposing</p> <p>22 counsel.</p> <p>23 (WHEREUPON, Plaintiff's Exhibit 2 was</p> <p>24 marked for identification.)</p> <p>25 MR. SHABAZZ: And Exhibit 3, which is --</p>

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<p style="text-align: right;">Page 50</p> <p>1 THE REPORTER: We don't have Exhibit 3.</p> <p>2 MR. DARE: Yep. We don't have Exhibit 3.</p> <p>3 MR. SHABAZZ: You don't have it?</p> <p>4 MR. DARE: Nope.</p> <p>5 MR. SHABAZZ: Do you have that?</p> <p>6 MR. DARE: No.</p> <p>7 MR. SHABAZZ: Okay. Well, I'll get back</p> <p>8 to it. I'm not going to use it right now, anyway.</p> <p>9 It would be Rankin County's Policies and Procedures</p> <p>10 as of 2005 revision, but I'll get back to that.</p> <p>11 Okay.</p> <p>12 BY MR. SHABAZZ:</p> <p>13 Q. Okay. Mr. Godfrey?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Okay. Help me clarify. How did -- how</p> <p>16 did somebody get on the SWAT team? How did they get</p> <p>17 on the SWAT team?</p> <p>18 A. Generally, they'd come by and ask how to</p> <p>19 get on the team. They'd ask me or another team</p> <p>20 member. We'd tell them the procedure. Put an</p> <p>21 application in, send a short electronic</p> <p>22 communication or a note they would like to try out</p> <p>23 for the team.</p> <p>24 Q. Okay. So there was an application</p> <p>25 process?</p>	<p style="text-align: right;">Page 52</p> <p>1 that we would use, he could come straight on the</p> <p>2 team. It didn't happen often.</p> <p>3 Q. Okay. And how did you -- how did you that</p> <p>4 they met those qualifications you just described?</p> <p>5 A. If we -- I mean you could call DeSoto</p> <p>6 County. Generally, again it's a small place.</p> <p>7 Everybody kind of knows who goes up there.</p> <p>8 Q. Okay. But just saying in reviewing their</p> <p>9 qualifications, did you have a formal procedure</p> <p>10 which -- which you were able to review those</p> <p>11 qualifications that just described?</p> <p>12 A. No.</p> <p>13 Q. Okay. Did the department -- did Rankin</p> <p>14 County Sheriff's Department give you a criterion to</p> <p>15 -- to determine who could be admitted to the SWAT</p> <p>16 team?</p> <p>17 A. No. The SOP stated you had to have a year</p> <p>18 on and stuff along those lines. I don't have the</p> <p>19 SOP in front of me. There was a basic SOP.</p> <p>20 Q. Okay.</p> <p>21 A. But we set up our own tryouts and</p> <p>22 everything else. Training, tryouts.</p> <p>23 Q. Okay. And do you have Christian Dedmon's</p> <p>24 records, sir? When he joined the SWAT team, did you</p> <p>25 -- did you compile any records in regards to --</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Again, a short memo to state I would like</p> <p>2 to be considered for a position on the SWAT team, or</p> <p>3 SRT team, I'm sorry.</p> <p>4 Q. Okay. Was there a formal application to</p> <p>5 get on the SWAT team?</p> <p>6 A. No, no, no.</p> <p>7 Q. And was there a formal review of the</p> <p>8 officer's record to get on the SWAT team?</p> <p>9 A. No.</p> <p>10 Q. Okay. And but was -- was there something</p> <p>11 written in all occasions when a person was to be</p> <p>12 placed on the SWAT team? Was there some written</p> <p>13 form of communication and affirmation if a person</p> <p>14 was to be admitted to the SWAT team?</p> <p>15 A. Not all the time, no. Not, no, no.</p> <p>16 Q. And could a deputy be admitted to the SWAT</p> <p>17 team orally?</p> <p>18 A. Possibly.</p> <p>19 Q. Just oral communication?</p> <p>20 A. Again yes, possibly. I don't remember any</p> <p>21 specifics if it ever happened. But if -- again, if</p> <p>22 a guy came over, say get on the Brandon team or get</p> <p>23 on the Flowood team or the Pearl team and he had</p> <p>24 been to the two week basic SWAT school in DeSoto</p> <p>25 County, and knew the standard operating procedures</p>	<p style="text-align: right;">Page 53</p> <p>1 A. No. No, sir. There is no separate SWAT</p> <p>2 file, other than we kept up with how often you</p> <p>3 showed up at training and stuff along those lines.</p> <p>4 Q. Okay.</p> <p>5 MR. DARE: Just to make it easier on the</p> <p>6 Court Reporter, if you could just wait until he</p> <p>7 finishes the question before you answer?</p> <p>8 THE DEPONENT: I'm sorry. Sorry.</p> <p>9 MR. DARE: That's all right.</p> <p>10 BY MR. SHABAZZ:</p> <p>11 Q. Yeah. But you were the first person that</p> <p>12 -- when you were the leader or commander of the SWAT</p> <p>13 unit, you were the first person to interview a</p> <p>14 person that was admitted to the SWAT team?</p> <p>15 A. No. Not an individual interview, no.</p> <p>16 Q. Okay. Who would that be?</p> <p>17 A. There was no initial interview. Again,</p> <p>18 somebody who express an interest. They would put in</p> <p>19 a -- either an electronic communication or even a</p> <p>20 handwritten note they might be considered. We would</p> <p>21 set a tryout date. They would come to tryouts.</p> <p>22 They would do the PT test, the FOMS</p> <p>23 (phonetic) test. Sometimes we ran a practical</p> <p>24 exercise, and then the team would meet and we would</p> <p>25 vote on whether to let that operator continue on.</p>

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<p style="text-align: right;">Page 54</p> <p>1 Q. And who is the "we" that voted?</p> <p>2 A. As I said about ten times sir, it was the</p> <p>3 team. The team at the time.</p> <p>4 Q. Okay. Who would that consist of?</p> <p>5 A. I don't know how to answer that, sir. The</p> <p>6 team. The people that were on the team.</p> <p>7 Q. Okay. Let me ask you -- let me ask you</p> <p>8 this. You said here that Christian Dedmon came on</p> <p>9 after you -- after you were there; is that correct?</p> <p>10 Christian Dedmon.</p> <p>11 A. Yes, sir.</p> <p>12 Q. Okay. Okay. Who was the team that</p> <p>13 decided whether Christian Dedmon would be accepted?</p> <p>14 A. I can't --</p> <p>15 MR. DARE: Asked and answered.</p> <p>16 MR. SHABAZZ: That's not true. I didn't</p> <p>17 ask him about --specifically about Christian Dedmon.</p> <p>18 THE DEPONENT: I don't know. I don't</p> <p>19 remember exactly when he came in, so I don't know</p> <p>20 who was there at that time. Team members come and</p> <p>21 go.</p> <p>22 BY MR. SHABAZZ:</p> <p>23 Q. Okay. But did you keep records of when</p> <p>24 Christian Dedmon came on?</p> <p>25 A. Not that I can remember, other than</p>	<p style="text-align: right;">Page 56</p> <p>1 anything along those lines.</p> <p>2 Q. Are you -- are you saying that you took --</p> <p>3 you took the reports on it?</p> <p>4 A. Not the report. Their statement.</p> <p>5 Q. You took their statement only and made a</p> <p>6 report?</p> <p>7 A. I took their statement, compiled them and</p> <p>8 gave them to the Sheriff or to you. I don't -- I</p> <p>9 mean I passed them on to the Sheriff or the counsel.</p> <p>10 I don't remember exactly.</p> <p>11 Q. Okay. Do you know -- were you the first -</p> <p>12 - were you the first official in Rankin to interview</p> <p>13 these deputies?</p> <p>14 A. Not to my knowledge.</p> <p>15 Q. Okay. Who was the first?</p> <p>16 A. I don't know, sir. Again, I was not</p> <p>17 involved in the investigation.</p> <p>18 Q. Okay. Well, you just -- you stated that</p> <p>19 you -- you interviewed the officers?</p> <p>20 A. Yes, sir.</p> <p>21 Q. As part of the -- as part of the</p> <p>22 investigation?</p> <p>23 A. I conducted a Garrity interview with each</p> <p>24 individual deputy. I did not --</p> <p>25 Q. That is -- that is part of the</p>
<p style="text-align: right;">Page 55</p> <p>1 putting him on the team roster. I mean I don't</p> <p>2 really --</p> <p>3 Q. Okay.</p> <p>4 A. We did not have a separate file for SRT</p> <p>5 members. It was they had their personnel file.</p> <p>6 Q. Okay. I'm talking about them being</p> <p>7 accepted on SRT. Being accepted on SRT by the team</p> <p>8 you described, and did this team keep any records or</p> <p>9 notes of the people they admitted to the SRT team?</p> <p>10 A. No, no, no.</p> <p>11 Q. No records were kept?</p> <p>12 A. No</p> <p>13 Q. Okay. In terms of Michael Jenkins and</p> <p>14 Eddie Parker, what was your purpose of interviewing</p> <p>15 officers involved?</p> <p>16 A. I was told by the Sheriff and counsel to</p> <p>17 conduct a Garrity interview.</p> <p>18 Q. Okay. And did you reach any findings or</p> <p>19 conclusions from your interview?</p> <p>20 A. Conducted the interview, wrote down their</p> <p>21 statement, provided it to the Sheriff.</p> <p>22 Q. And did you -- did you compile any other</p> <p>23 reports as to your views or opinions about what had</p> <p>24 happened?</p> <p>25 A. No, sir. I wasn't asked to do opinions or</p>	<p style="text-align: right;">Page 57</p> <p>1 investigation, isn't it?</p> <p>2 A. If you'd like to call it that, yes sir.</p> <p>3 Q. Okay. And you say you were not the first</p> <p>4 to interview them?</p> <p>5 A. I don't know if I was. I don't think so.</p> <p>6 I would imagine the people who were on the scene</p> <p>7 that night interviewed them.</p> <p>8 Q. Okay. And you made no reports to Sheriff</p> <p>9 Bailey on your assessment of these interviews that</p> <p>10 you did?</p> <p>11 A. I did not provide an assessment. I took</p> <p>12 their statement and provided a statement for the</p> <p>13 Sheriff.</p> <p>14 Q. Okay. Then --</p> <p>15 A. I was not asked what I thought.</p> <p>16 Q. All right, okay. I understand. All</p> <p>17 right. Let me show you what's been marked as</p> <p>18 Plaintiff's Exhibit 1. I'm going to put it up on</p> <p>19 the screen and --</p> <p>20 A. Is this the lawsuit?</p> <p>21 Q. This is the interrogatories provided by</p> <p>22 Defendant in this lawsuit.</p> <p>23 A. Yes, I see it.</p> <p>24 Q. Okay. Can you -- I want you to -- can you</p> <p>25 turn your attention to page number eight of what we</p>

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<p style="text-align: right;">Page 58</p> <p>1 have marked as Exhibit No. 1.</p> <p>2 THE REPORTER: Noted.</p> <p>3 THE DEPONENT: Page eight. Yes, sir.</p> <p>4 BY MR. SHABAZZ:</p> <p>5 Q. Okay. I'm going to go down a list of</p> <p>6 cases and matters, to see whether or not you're</p> <p>7 familiar with these cases or matters, okay?</p> <p>8 The first one is Easterling v. Mississippi</p> <p>9 Correctional Services. Are you familiar --</p> <p>10 A. I'm not familiar with this.</p> <p>11 Q. Okay. Jones v. Williams?</p> <p>12 A. No, sir.</p> <p>13 Q. Okay. Wilson v. Apoftolidis?</p> <p>14 A. No, sir.</p> <p>15 Q. Okay. Curtis v. Doe?</p> <p>16 A. No, sir.</p> <p>17 Q. Johnson v. Bailey?</p> <p>18 A. No, sir.</p> <p>19 Q. Patty Paige v. Rankin County?</p> <p>20 A. No, sir.</p> <p>21 Q. De LaCruz v. Rankin County?</p> <p>22 A. No, sir.</p> <p>23 Q. Okay. Barrett v. Pelahatchie?</p> <p>24 A. Pelahatchie? No, sir.</p> <p>25 Q. Well, that's the Pierre Woods case.</p>	<p style="text-align: right;">Page 60</p> <p>1 have some passing knowledge just from overheard</p> <p>2 conversations or something may have been talked</p> <p>3 about in a staff meeting or something along those</p> <p>4 lines.</p> <p>5 Q. Okay. But you do know about Jenk. We</p> <p>6 just talked about Jenk, Jenkins v. Rankin County, so</p> <p>7 you know about that.</p> <p>8 MR. DARE: Jenkins. That's the one we're</p> <p>9 here on today.</p> <p>10 THE DEPONENT: The one we're here on</p> <p>11 today. Yes sir, I know about the situation, but I</p> <p>12 was not there, and I conducted Garrity interviews.</p> <p>13 BY MR. SHABAZZ:</p> <p>14 Q. Okay. So you did participate in that</p> <p>15 investigation?</p> <p>16 A. Giving counsel.</p> <p>17 Q. All right. Okay. So none of them.</p> <p>18 You're saying the rest. McWarren v. Davis, Carson</p> <p>19 v. Rankin County, Adams v. Bailey, Reddell v. Rankin</p> <p>20 County, Mack v. Rankin County. You're not familiar</p> <p>21 with those cases. Is that what you're saying?</p> <p>22 A. If you -- again, if you'll go to some</p> <p>23 detail, it may refresh my memory as to what</p> <p>24 happened. But I did not</p> <p>25 -- was not involved in any of those investigations.</p>
<p style="text-align: right;">Page 59</p> <p>1 A. I'm not familiar with the legal</p> <p>2 proceedings or anything along those lines.</p> <p>3 Q. I mean you were -- you were on the scene</p> <p>4 for Pierre Woods?</p> <p>5 A. Okay.</p> <p>6 Q. Okay. So what was your -- was your</p> <p>7 involvement? Other than being on the scene, what</p> <p>8 was your involvement in that case?</p> <p>9 A. Was trying to run the tactical operation.</p> <p>10 Q. Okay. Was that matter investigated?</p> <p>11 A. Mississippi Bureau of Investigation.</p> <p>12 Q. Okay. Giles v. Dedmon?</p> <p>13 A. Sir, if you're going to try to flip back</p> <p>14 on me and trip me with these things, just you have</p> <p>15 to give me details, because the names don't ring a</p> <p>16 bell.</p> <p>17 Q. I'm not trying to trick you with anything.</p> <p>18 I'm just -- I'm asking you just about the cases.</p> <p>19 A. Okay. Again, I don't know the names. If</p> <p>20 you think I know something about it, if you'll tell</p> <p>21 me some of the details that may refresh. Again, I</p> <p>22 looked down the list as you were talking. I'm not</p> <p>23 familiar with any of them, to my knowledge. If you</p> <p>24 can give me some details.</p> <p>25 I did not investigate any of these. I may</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. Okay. And again, all of the</p> <p>2 investigations that you did for Rankin County, you</p> <p>3 said that -- that those -- the records of your</p> <p>4 investigation and your finding would be in the</p> <p>5 possession of Rankin County; is that correct?</p> <p>6 A. I would -- I would hope so.</p> <p>7 Q. Okay. And in all the investigations you</p> <p>8 did over the years, you do have written</p> <p>9 documentation of your work on those investigations</p> <p>10 you did participate in?</p> <p>11 A. The ones I produced I gave to the Sheriff,</p> <p>12 sir. I have no idea what may have happened to them.</p> <p>13 Q. Okay. And did you conduct -- and in every</p> <p>14 case that you did investigate, you did have written</p> <p>15 --</p> <p>16 A. Not necessarily. Not necessarily. Again,</p> <p>17 if it was a minor -- something minor or found to be</p> <p>18 unfounded, I may just go on and tell the Sheriff it</p> <p>19 was nothing to that or whatever.</p> <p>20 Q. Okay. And but you wouldn't formally</p> <p>21 document that there was --</p> <p>22 A. Not necessarily.</p> <p>23 Q. Okay. All right. Now in -- what caused</p> <p>24 you in November of 2023 to leave the department?</p> <p>25 A. Again, I had time -- enough time in to</p>

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<p style="text-align: right;">Page 62</p> <p>1 retire. It was just time to go.</p> <p>2 Q. Okay. Were you involved in any way in the</p> <p>3 restructuring of the Rankin County Sheriff's</p> <p>4 Department?</p> <p>5 A. After that time?</p> <p>6 Q. Yes.</p> <p>7 A. No. I was no longer employed there.</p> <p>8 Q. I'm talking about prior to you leaving.</p> <p>9 Were you involved in the restructuring of the</p> <p>10 department?</p> <p>11 MR. DARE: Object to the form. You can</p> <p>12 answer if you know what --</p> <p>13 THE DEPONENT: To my knowledge, there was</p> <p>14 no reformation before I left.</p> <p>15 BY MR. SHABAZZ:</p> <p>16 Q. And when you stated that there was no</p> <p>17 Internal Affairs Division?</p> <p>18 A. Right.</p> <p>19 Q. While you were there; correct?</p> <p>20 A. Correct, correct.</p> <p>21 Q. Up til November '23; correct?</p> <p>22 A. Correct.</p> <p>23 Q. There was no Internal Affairs Division?</p> <p>24 A. Not to my knowledge.</p> <p>25 Q. Okay. I want to show you what's marked as</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. Well, why would you assume that?</p> <p>2 A. Most departments have them.</p> <p>3 Q. Did Rankin have one?</p> <p>4 MR. DARE: Asked and answered.</p> <p>5 BY MR. SHABAZZ:</p> <p>6 Q. Okay. Okay. Indulge me for a second.</p> <p>7 A. Yes, sir.</p> <p>8 Q. Okay. You said that you were -- you</p> <p>9 supervised training at Rankin during your roughly</p> <p>10 decade-long tenure; is that correct?</p> <p>11 A. Yes. You could say that, yes sir.</p> <p>12 Q. Okay. Could you -- could you describe</p> <p>13 your -- your duties and responsibilities in general,</p> <p>14 outside of SRT, your training responsibilities</p> <p>15 internally?</p> <p>16 A. Mostly maintain the training records.</p> <p>17 Q. Okay. You just maintained the records?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Okay. Did you -- did you conduct the</p> <p>20 training?</p> <p>21 A. Firearms or something like that. Maybe we</p> <p>22 would have something small like that, yes sir. But</p> <p>23 I never -- I never was -- never participated in any</p> <p>24 department-wide instruction as an instructor.</p> <p>25 Q. Okay. When you began, who was in -- who</p>
<p style="text-align: right;">Page 63</p> <p>1 --</p> <p>2 A. Exhibit 2?</p> <p>3 Q. Plaintiff's Exhibit No. 2.</p> <p>4 A. Yes, sir.</p> <p>5 Q. Okay. This is a -- a flow chart of Rankin</p> <p>6 County structure. Are you familiar with this flow</p> <p>7 chart?</p> <p>8 A. No, sir.</p> <p>9 Q. You never -- have you ever seen this flow</p> <p>10 chart?</p> <p>11 A. No, sir. If you'll look at the date on</p> <p>12 it, effective November 2023 I was no longer at the</p> <p>13 Sheriff's Office.</p> <p>14 Q. Okay. So did you all have a flow chart of</p> <p>15 the structure of Rankin County Sheriff's Department</p> <p>16 while you were serving there?</p> <p>17 A. Possibly. I don't know.</p> <p>18 Q. Well, possibly. I mean is it yes or no?</p> <p>19 A. Not to my knowledge.</p> <p>20 Q. You never saw a flow chart, an</p> <p>21 organizational flow chart --</p> <p>22 A. Nothing.</p> <p>23 Q. Okay. While you were there?</p> <p>24 A. Not to my knowledge, no. I'm sure there's</p> <p>25 probably one that exists somewhere.</p>	<p style="text-align: right;">Page 65</p> <p>1 actually did the training? Who was in charge of the</p> <p>2 training when you came on in Rankin?</p> <p>3 A. Who's the guy that's -- the counsel.</p> <p>4 MR. DARE: I can't give you answers.</p> <p>5 You've got to testify --</p> <p>6 THE DEPONENT: Okay. There was a guy who</p> <p>7 was an off -- in-house counsel. He kind of ran the</p> <p>8 training program then too. I'm just drawing a blank</p> <p>9 now. I'm sorry. At 71, I have a little trouble --</p> <p>10 BY MR. SHABAZZ:</p> <p>11 Q. So what now? Tell me that -- tell me that</p> <p>12 again?</p> <p>13 A. When I started there, the in-house counsel</p> <p>14 also ran the training program.</p> <p>15 Q. You're talking about an attorney?</p> <p>16 A. Yes, sir. That would be in-house counsel.</p> <p>17 Q. Okay. Who would that be?</p> <p>18 MR. DARE: If you don't recall the name</p> <p>19 just --</p> <p>20 THE DEPONENT: I don't. I mean I know it.</p> <p>21 I just can't bring it up right now.</p> <p>22 BY MR. SHABAZZ:</p> <p>23 Q. Okay. In-house counsel or lawyer ran the</p> <p>24 Rankin training up until when?</p> <p>25 A. Til he left. Well, no. Kind of after I</p>

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<p style="text-align: right;">Page 66</p> <p>1 got there and got my feet on the ground, kind of --</p> <p>2 I was in charge of training. Six months maybe, a</p> <p>3 year maybe.</p> <p>4 Q. Okay. And but you don't recall his name?</p> <p>5 A. It will come to me, and in fact I'll</p> <p>6 probably interrupt you in a minute when it pops into</p> <p>7 my brain.</p> <p>8 Q. Okay. That's fine. We can come back to</p> <p>9 it. Okay. So after that person, who was in charge</p> <p>10 of the training?</p> <p>11 A. I was nominally in charge of it.</p> <p>12 Q. Okay. For how long?</p> <p>13 A. Until I left.</p> <p>14 Q. And so you were in charge of the training</p> <p>15 of the officers, of all of the Rankin deputies for</p> <p>16 your -- from when that in-house counsel left up to</p> <p>17 the end of your tenure?</p> <p>18 A. I think I said that.</p> <p>19 Q. Okay. Now a moment ago, you said that --</p> <p>20 that you were reviewing. That means that you</p> <p>21 participated in the firearms aspect of the training?</p> <p>22 A. Well, I ran the firearms program. Yes,</p> <p>23 sir.</p> <p>24 Q. Okay. But now when you say that you were</p> <p>25 in charge of the training for your entire tenure,</p>	<p style="text-align: right;">Page 68</p> <p>1 Undersheriff made the decision who would go. I was</p> <p>2 mostly just a conduit for that.</p> <p>3 Q. Okay. And what training -- other than the</p> <p>4 firearm training, what trainings did the deputies in</p> <p>5 Rankin receive?</p> <p>6 A. Again, if you wanted to go to a training.</p> <p>7 If you as an individual deputy, if you were</p> <p>8 interested in something and you heard about or saw a</p> <p>9 course being offered, they might ask me to go to</p> <p>10 something. They may go to the Sheriff and ask.</p> <p>11 They may go to the Undersheriff and ask, and it</p> <p>12 would be approved and they would be sent to the</p> <p>13 training.</p> <p>14 Q. Okay. What about specifically for</p> <p>15 excessive force training?</p> <p>16 A. I think they had --</p> <p>17 Q. Emphasis on excessive force.</p> <p>18 A. I don't remember. I know I never put on</p> <p>19 any kind of in-house personally training on</p> <p>20 excessive force. They covered that in basic, I'm</p> <p>21 assuming, and I think Jeff Artis came in and put on</p> <p>22 a Color of Law school once.</p> <p>23 Q. Okay.</p> <p>24 A. Again, this -- I kept records, sir. I</p> <p>25 didn't set up most of the training.</p>
<p style="text-align: right;">Page 67</p> <p>1 could you give me a further description on your</p> <p>2 duties and responsibilities there?</p> <p>3 MR. DARE: Object to form. You can</p> <p>4 answer.</p> <p>5 BY MR. SHABAZZ:</p> <p>6 Q. What were your duties -- I'll repeat it.</p> <p>7 What were your duties and responsibilities as the</p> <p>8 training officer?</p> <p>9 A. I kind of kept up with the records, and</p> <p>10 that was about it.</p> <p>11 Q. Okay. But who conducted the trainings?</p> <p>12 A. What kind of training are you talking</p> <p>13 about? I mean that's -- that's a -- that runs a</p> <p>14 wide gamut. We sent people outside the department.</p> <p>15 The last couple of years I was there, we contracted</p> <p>16 with the Virtual Academy, which is a private entity,</p> <p>17 to provide online training.</p> <p>18 If they needed DUI training, they went to</p> <p>19 any academy that was offering such. A lot of</p> <p>20 training offers would be sent through me. I would</p> <p>21 get in an email this course is being offered, that</p> <p>22 course is being offered, and I would send it out to</p> <p>23 the department. Anyone interested, please let me</p> <p>24 know.</p> <p>25 But generally, the Sheriff or the</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. Okay. But you would have the records of</p> <p>2 any trainings that the deputy received on use of</p> <p>3 excessive force; correct?</p> <p>4 A. I haven't, no sir.</p> <p>5 Q. No. I'm just saying you're aware of those</p> <p>6 records, right? You would be aware --</p> <p>7 A. And if they went -- if they went to get</p> <p>8 training and got a certificate, a copy was placed in</p> <p>9 their training file.</p> <p>10 Q. Okay. But I mean -- I mean I'm just</p> <p>11 saying, are you aware of any specific training on</p> <p>12 excessive force --</p> <p>13 A. Personally, I am not.</p> <p>14 Q. You're not aware of that?</p> <p>15 A. I'm not aware of any. I'm not saying they</p> <p>16 didn't. I am not aware of it. I can't say "on this</p> <p>17 date they went here," no.</p> <p>18 Q. Okay. Now I'm going to ask you about --</p> <p>19 let's go down the deputies, just outside of SRT.</p> <p>20 A. Okay.</p> <p>21 Q. I want to see if for the investigations</p> <p>22 that you did conduct, I want to ask you about each</p> <p>23 of these individuals and did you conduct an</p> <p>24 investigation into any of these deputies' activities</p> <p>25 at any time in your tenure, okay. I'm going to ask</p>

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70 to 73

<p style="text-align: right;">Page 70</p> <p>1 you about it, that in the course of your tenure did</p> <p>2 you investigate any of these deputies for any</p> <p>3 matters in the course of your tenure in the</p> <p>4 department, okay?</p> <p>5 Okay. Christian Dedmon. Did you ever</p> <p>6 investigate him at all at any time for anything?</p> <p>7 A. Not personally, no.</p> <p>8 Q. Okay. Jeffrey Middleton.</p> <p>9 A. Not personally, no.</p> <p>10 Q. Okay. But did you ever investigate at any</p> <p>11 time for any matter Brett McAlpin?</p> <p>12 A. Not to the best of my recollection.</p> <p>13 Q. Okay. At any time, did you interview -- I</p> <p>14 mean pardon me, investigate Deputy Opdyke?</p> <p>15 A. Not to the best of my recollection.</p> <p>16 Q. Okay. At any time, did you investigate or</p> <p>17 look into any allegations regarding Hunter Elward,</p> <p>18 at any time?</p> <p>19 A. Not to the best of my recollection, sir.</p> <p>20 Q. Okay. And is it true that the matters you</p> <p>21 were asked to investigate, that Bryan Bailey bring</p> <p>22 these matters to you?</p> <p>23 A. I'm not clear on that question.</p> <p>24 Q. Was the source of -- the matters you did</p> <p>25 investigate, was the sole source of your</p>	<p style="text-align: right;">Page 72</p> <p>1 That's actually a fact.</p> <p>2 MR. DARE: Objection, argumentative. But</p> <p>3 if you want to ask your question.</p> <p>4 BY MR. SHABAZZ:</p> <p>5 Q. Well, he wanted to know more about it, so</p> <p>6 I'm just asking you.</p> <p>7 A. Okay.</p> <p>8 Q. You were at the department til November</p> <p>9 2023, right?</p> <p>10 A. That's when I resigned. I'm trying to</p> <p>11 think. Or not resigned, I just retired. No. In</p> <p>12 November of 2023?</p> <p>13 Q. You were there in December of 2022;</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. Yes, okay. And Allen Smith is a part of</p> <p>17 the case against the -- what they call the Rankin</p> <p>18 County Goon Squad.</p> <p>19 A. Okay.</p> <p>20 Q. Are you familiar with the Rankin County</p> <p>21 Goon Squad?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. When did you first become aware of</p> <p>24 the Rankin County Goon Squad --</p> <p>25 A. Maybe six months before. The Goon Squad</p>
<p style="text-align: right;">Page 71</p> <p>1 instructions to investigate these matters coming</p> <p>2 from Bryan Bailey?</p> <p>3 A. Probably, yes. I mean the Chief</p> <p>4 Investigator may say "hey, we had this. Would you</p> <p>5 mind looking at it?" But as far as formal --</p> <p>6 opening a formal investigation, it would come</p> <p>7 through the Sheriff. Someone may come say "The</p> <p>8 Sheriff wants you to do this" and "The Sheriff wants</p> <p>9 you to do that."</p> <p>10 Q. Okay. But did you initiate any</p> <p>11 investigations into misconduct on your own?</p> <p>12 A. No.</p> <p>13 Q. Okay. All right. One second.</p> <p>14 A. Yes, sir.</p> <p>15 Q. Okay. For your investigations, I want to</p> <p>16 ask you are you familiar with a citizen by the name</p> <p>17 of Allen Smith?</p> <p>18 A. Not personally. If you could give me some</p> <p>19 how I should know him, I might be able to remember</p> <p>20 something along those lines.</p> <p>21 Q. Allen Smith was abused and attacked by</p> <p>22 Rankin County deputies in December of 2022.</p> <p>23 A. That's alleged, right?</p> <p>24 MR. WALKER: No.</p> <p>25 MR. SHABAZZ: No. That's a fact, sir.</p>	<p style="text-align: right;">Page 73</p> <p>1 is not what the public thinks the Goon Squad is.</p> <p>2 The Goon Squad was a nickname that Jeffrey</p> <p>3 Middleton's squad had. It's just a name of their</p> <p>4 night shift operation. They had a coin made. It</p> <p>5 was a camaraderie-building thing.</p> <p>6 Q. Okay. How do you -- how did you come to</p> <p>7 know about that?</p> <p>8 A. It wasn't -- it was an apparently well-</p> <p>9 known fact. I had a coin and everything. Middleton</p> <p>10 had him made, and it was his --</p> <p>11 Q. How did you get one?</p> <p>12 A. Okay. Middleton gave me one.</p> <p>13 Q. And when did Middleton give you that coin?</p> <p>14 A. Some time in the fall, maybe. It was at</p> <p>15 firearms training one day or maybe SRT training one</p> <p>16 day. He had -- he had said "hey, I'm getting some</p> <p>17 coins made. I'll give you one." I said that's</p> <p>18 fine, you know.</p> <p>19 Q. Okay. And this was a coin that designated</p> <p>20 the Goon Squad?</p> <p>21 A. Yeah.</p> <p>22 Q. And did this coin have the Rankin County</p> <p>23 Sheriff's Department emblem on the --</p> <p>24 A. It did.</p> <p>25 Q. -- other side?</p>

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74 to 77

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1 A. It did.

2 Q. Okay. When was that shown to you?

3 A. Again, some time in the fall as best I can

4 remember, shortly after he had them made.

5 Q. Fall, but fall of what year?

6 A. Times are running together, counsel. Some

7 time in the fall of 2023 I assume. I have trouble

8 remembering what year it is now, sir. I don't work

9 anymore.

10 Q. You left in -- you left in the fall of

11 2023. Was it the year you left or the year before

12 you left?

13 A. It was before the incident. So three --

14 Q. So before --

15 A. Within three or four months, something

16 along those lines.

17 Q. Okay. Three or four months before the

18 Jenkins incident, you were shown the Goon Squad coin

19 by Deputy Middleton?

20 A. Right. Uh-huh.

21 Q. It had the Goon Squad on one side?

22 A. Yes, sir.

23 Q. And it had the Rankin County Sheriff's

24 Department on the other side?

25 A. Yes, sir.

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1 Q. Okay. And what was your response to

2 Jeffrey Middleton showing you that coin?

3 A. It's just a coin. It was just his -- his

4 shift's coin.

5 Q. Okay. And so to you, it was just a coin?

6 A. Yes, sir. I mean that's just what they

7 call themselves, his shift.

8 Q. Okay.

9 A. They work at night and it's kind of just

10 what they call themselves.

11 Q. Okay. Did you follow up and ask Mr.

12 Middleton about the purpose of his squad represented

13 by his coin?

14 A. No.

15 Q. And what did you ask Jeffrey Middleton?

16 What did you say to Jeffrey Middleton when he showed

17 you the coin?

18 A. Not much.

19 Q. Did you tell Sheriff Bailey that Jeffrey

20 Middleton had a coin, a Goon Squad --

21 A. No. I had assumed the Sheriff had one. I

22 don't -- I don't know.

23 Q. Okay. Now why did you assume the Sheriff

24 had one?

25 A. They were passing them around.

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1 Q. Okay. Who was passing them around?

2 A. Middleton, and I guess the people on his

3 squad. They paid to have them made.

4 Q. Okay. They paid to have them made. So,

5 and how did you know they were being passed around?

6 A. You would see them around. People would

7 have one.

8 Q. In the department?

9 A. Yes, sir.

10 Q. Okay. Like where, for instance?

11 A. In the office. Sir, can I ask you a

12 question? Are you familiar with just challenge

13 coins in general? It's very common in law

14 enforcement.

15 Q. Sir, I'm asking the questions.

16 A. Go right ahead.

17 Q. Thank you, sir. Okay. So these coins

18 were being passed around the Rankin County Sheriff's

19 Department in the -- you say in the fall of 2022?

20 A. To the best of my recollection, counselor.

21 Q. Okay. And could you describe how these

22 coins were being distributed around?

23 A. No, sir. I cannot. I cannot.

24 Q. Well, you just said that -- so tell me how

25 -- tell me how it happened?

Page 77

1 A. Somebody would have a coin.

2 Q. Okay. Like who would have a coin?

3 A. A deputy.

4 Q. Okay. Tell me example. When the times

5 that you saw the coin being passed around, can you

6 explain what happened?

7 A. No. I just -- I have a coin. Somebody

8 said "Have you seen Middleton's coin?" Yeah, I saw

9 it. I mean that was just it.

10 Q. Okay. So is it fair to say that it was

11 common knowledge in the Rankin County Sheriff's

12 Department that there was a Goon Squad operating --

13 A. I can't. I can't say it was common

14 knowledge.

15 Q. Okay. But you can say that this Goon

16 Squad coin was being -- coins, plural, were being

17 distributed around the office?

18 A. I know some people had one. I don't know

19 if they were being distributed.

20 Q. Did Sheriff Bailey have one?

21 A. I do not know.

22 Q. Okay. And did you ever discuss this with

23 Sheriff Bailey?

24 A. Saw no reason to discuss it.

25 Q. You saw no reason to discuss the Goon

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78 to 81

<p style="text-align: right;">Page 78</p> <p>1 Squad coin with Sheriff Bailey?</p> <p>2 A. No, sir.</p> <p>3 Q. Okay. And so later on, when you found out</p> <p>4 what happened with Michael Jenkins and Eddie Parker,</p> <p>5 do you still hold the same position, that the Goon</p> <p>6 Squad is not important, that the coin wasn't</p> <p>7 important?</p> <p>8 A. I don't know what you're asking now.</p> <p>9 Q. After the incident with Jenkins and</p> <p>10 Parker, you found out that this Goon Squad had been</p> <p>11 involved in these serious incidents. Did you still</p> <p>12 maintain the position that the coin and the</p> <p>13 organization -- the Goon Squad was of no importance?</p> <p>14 A. Again, the Goon Squad coin and the</p> <p>15 incident had nothing to do with each other, in my</p> <p>16 opinion, because it wasn't Middleton's squad. It</p> <p>17 was Middleton and several people on his squad, but</p> <p>18 there were also several people who were not in his -</p> <p>19 - at the incident that were on his squad.</p> <p>20 Q. Now did you institute or take any actions</p> <p>21 to investigate Middleton and his organizing of the</p> <p>22 Goon Squad?</p> <p>23 A. He didn't -- the Goon Squad was his squad,</p> <p>24 the men that were assigned to him. Now the Goon</p> <p>25 Squad was later adopted by the media to me</p>	<p style="text-align: right;">Page 80</p> <p>1 sub-organization and no, I don't know of any policy.</p> <p>2 Q. Okay. What do you consider the Goon</p> <p>3 Squad?</p> <p>4 A. At that time?</p> <p>5 Q. Yes, at that time.</p> <p>6 A. His shift. His shift.</p> <p>7 Q. The night shift?</p> <p>8 A. His night shift.</p> <p>9 Q. But you considered the Goon Squad to be</p> <p>10 the entire night shift?</p> <p>11 MR. DARE: Object to the form.</p> <p>12 BY MR. SHABAZZ:</p> <p>13 Q. Okay. But you said -- you said "his</p> <p>14 shift"?</p> <p>15 A. Yeah.</p> <p>16 Q. Okay, which was the night shift; correct?</p> <p>17 A. Correct.</p> <p>18 Q. How many years did Jeffrey Middleton run</p> <p>19 the night shift?</p> <p>20 A. I can't -- I don't know.</p> <p>21 Q. Okay. How many years in which you were in</p> <p>22 the Department was he in charge of the night shift?</p> <p>23 A. I don't know. I don't know when he got</p> <p>24 promoted to that position. I think he had a day</p> <p>25 shift for a while, and I think he switched over to a</p>
<p style="text-align: right;">Page 79</p> <p>1 incorrectly, because it was not his shift that did</p> <p>2 this. Do you see the difference?</p> <p>3 Q. You said what? Well, explain me the</p> <p>4 difference.</p> <p>5 A. Not everybody on his shift was at that</p> <p>6 incident, to my knowledge.</p> <p>7 Q. Not everybody on his shift was at the</p> <p>8 incident?</p> <p>9 A. To my knowledge.</p> <p>10 Q. Okay. Who -- how do you know the</p> <p>11 structure of the Goon Squad? How do you know who's</p> <p>12 on it and wasn't on it?</p> <p>13 A. I've been reading the news for the last 18</p> <p>14 months.</p> <p>15 Q. I'm saying while you were in the</p> <p>16 department, how do you know who was on it and who</p> <p>17 wasn't on it?</p> <p>18 A. To my knowledge, when the coin was made</p> <p>19 and passed out, it was Jeffrey Middleton's shift,</p> <p>20 his deputies assigned to him.</p> <p>21 Q. Okay. And is -- is it anywhere in the</p> <p>22 Rankin County policies where you're allowed to</p> <p>23 create other sub-organizations within the Rankin</p> <p>24 County Sheriff's Department?</p> <p>25 A. I wouldn't consider the Goon Squad to be</p>	<p style="text-align: right;">Page 81</p> <p>1 night shift or something along those lines. They</p> <p>2 shift responsibilities fairly regularly.</p> <p>3 Q. But he was in charge of the shift;</p> <p>4 correct?</p> <p>5 A. When the Goon Squad coin was made, yes</p> <p>6 sir.</p> <p>7 Q. Okay. How did you know he was in -- how</p> <p>8 did you know he was in charge of the shift?</p> <p>9 A. He was the lieutenant in charge of the</p> <p>10 shift.</p> <p>11 Q. Okay. When did that begin, though?</p> <p>12 A. I don't know. I can't give you a date as</p> <p>13 to --</p> <p>14 Q. Do you have any idea? Have any idea, just</p> <p>15 any idea?</p> <p>16 A. No. I just know he was -- he's been a</p> <p>17 lieutenant for four-five years, maybe. I don't</p> <p>18 know.</p> <p>19 Q. Okay, okay. And you found no reason to</p> <p>20 follow up, to look into this Goon Squad once you</p> <p>21 became aware of it?</p> <p>22 A. No, he told me. He said "Hey, our shift,</p> <p>23 they call us the Goon Squad." They had been to a</p> <p>24 class, one of them had been to a class or something</p> <p>25 and he said that the goons were the people who got</p>

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82 to 85

<p style="text-align: right;">Page 82</p> <p>1 the ass jobs, you know, that nobody else wanted to 2 do and stuff along those lines is the only thing I 3 know. I mean it was just -- again, I think it was a 4 camaraderie-building thing with his team. The 5 latest thing --</p> <p>6 Q. And you saw --</p> <p>7 A. Go ahead.</p> <p>8 Q. You saw no reason to be concerned about 9 this Goon Squad, didn't you?</p> <p>10 A. Not at that time, no sir.</p> <p>11 Q. Okay. Did you hear about -- okay. And is 12 it -- is it -- is it fair to say from your 13 description that the Goon Squad consisted of the 14 entire night shift at the Rankin County Sheriff's 15 Department?</p> <p>16 MR. DARE: Object to the form. You can 17 answer again, but --</p> <p>18 THE DEPONENT: I'm trying to figure out 19 where you're going with this, sir. Again, the coin 20 was made for Jeffrey Middleton's shift.</p> <p>21 BY MR. SHABAZZ:</p> <p>22 Q. Right.</p> <p>23 A. Right.</p> <p>24 Q. Okay.</p> <p>25 A. Very good. We've got that.</p>	<p style="text-align: right;">Page 84</p> <p>1 was Dwayne Thornton.</p> <p>2 Q. Okay. What happened to Mr. Thornton?</p> <p>3 A. Got promoted.</p> <p>4 Q. Okay. And he's holding. Now his position 5 is what now? I'm trying to get --</p> <p>6 A. Now today, I do not know now. He was --</p> <p>7 Q. Before he was promoted. When he was 8 supervising the night shift, what was his position?</p> <p>9 A. He was the Chief of Patrol. Chief Deputy 10 of Patrol, yes sir.</p> <p>11 Q. Okay. And at the time of the incident. 12 When was he promoted?</p> <p>13 A. Can't answer that.</p> <p>14 Q. Well, you said he was promoted, right?</p> <p>15 A. Yeah.</p> <p>16 Q. Okay. When?</p> <p>17 A. I don't know. I can't give you a name.</p> <p>18 Q. It was after -- it was after the incident, 19 right?</p> <p>20 A. He was moved from Chief of the Patrol to 21 the Chief Deputy. I mean to Undersheriff, I'm 22 sorry.</p> <p>23 Q. Thornton went to Undersheriff. Okay.</p> <p>24 A. Yes.</p> <p>25 Q. Now this happened -- this happened between</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. But this coin, did this coin represent the 2 entire night shift of the Rankin County Sheriff 3 Department?</p> <p>4 A. At the time it was produced, it was about 5 Jeffrey Middleton's shift.</p> <p>6 Q. Okay. About how many deputies are 7 typically on the night shift?</p> <p>8 A. On each shift? Each --</p> <p>9 Q. On the night shift. About how many 10 roughly run on the night shift?</p> <p>11 A. Seven, eight, something like that.</p> <p>12 Q. Seven-eight deputies total on the night 13 shift?</p> <p>14 A. As a -- as a WAG.</p> <p>15 Q. Okay. Now who was responsible for -- for 16 supervising Middleton and the night shift?</p> <p>17 A. That would be the Chief of Patrol.</p> <p>18 Q. Chief of Patrol. Well, who was that at 19 the -- who was that at the time you left?</p> <p>20 A. When I left or when the incident occurred?</p> <p>21 Q. First of all, when you left.</p> <p>22 A. Kool-Aid was the Chief of Patrol when I 23 left. His name is -- well, I'll call him Kool-Aid. 24 That's his nickname. He's the Chief -- he's the 25 Chief of Patrol now. When the incident occurred, it</p>	<p style="text-align: right;">Page 85</p> <p>1 January of 2023 and between the time you left in the 2 fall?</p> <p>3 A. Yeah, right.</p> <p>4 Q. Okay. So about how long after the 5 incident? Two months, four months?</p> <p>6 A. WAGING it, two months to four months.</p> <p>7 Q. Okay. And the night shift is where the 8 violations occurred against Jenkins and Parker; 9 correct?</p> <p>10 MR. DARE: Object to the form. You can 11 answer.</p> <p>12 THE DEPONENT: It happened at night, I 13 think sir. Yes, sir. It was --</p> <p>14 BY MR. SHABAZZ:</p> <p>15 Q. Okay. Okay. And Thornton was promoted -- 16 and Thornton was then supervisor?</p> <p>17 A. He was the Chief of Patrol. You asked me 18 about -- I guess you can say --</p> <p>19 THE REPORTER: May I remind y'all to speak 20 one at a time?</p> <p>21 THE DEPONENT: I'm sorry. I guess you can 22 say he supervises every patrol deputy, if you want 23 to take it that far. But he -- you asked me who 24 Middleton -- supervised Middleton, and that's how 25 this conversation started.</p>

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<p>1 BY MR. SHABAZZ: 2 Q. Okay. So after the Jenkins and Parker 3 incident, did you -- did you have any meetings at 4 the -- with Sheriff Bailey about what happened? 5 A. Yeah, yeah. We had staff meetings, of 6 course. 7 Q. Can you -- can you tell me when did those 8 -- when did those meetings occur? 9 A. The staff meeting every -- every day. 10 Q. You met every day about this incident? 11 A. No. We have staff meeting every day. 12 Q. Okay. But you met about the incident with 13 Jenkins and Parker? 14 A. I was in on -- the only time I can 15 remember that I was in a meeting specifically about 16 the incident was when Adam Smith from the FBI came 17 over to talk was the first time. That was the only 18 incident-specific meeting I remember being in. It 19 may have come up, or I'm sure it came up at several 20 times during staff meetings. 21 Q. Okay. In the meeting with the FBI, can 22 you tell me what happened in that meeting? 23 A. He just asked a few questions, and that 24 was about it. I don't really remember, because I 25 didn't have anything particularly directed toward</p>	<p>Page 86 1 investigation; correct? 2 A. That limited -- that limited my 3 involvement with the investigation. 4 Q. That is involvement. That's important 5 involvement. 6 A. Counsel, I gave you that at least a dozen 7 times. 8 Q. No, you haven't. I'm asking about -- 9 A. Yes, I have. 10 Q. -- the importance of it. You said it 11 wasn't important. I'm speaking on the importance of 12 it, because 13 -- because you said that you couldn't recall what 14 the FBI said in a critical meeting just a year ago. 15 A. No. 16 Q. Well, just recently. Before you left, you 17 said the FBI was involved and they came to ask 18 questions, and you can't remember what happened -- 19 A. That's correct. 20 Q. -- at the meeting, because it wasn't that 21 important to you? 22 A. I didn't say it wasn't important. I said 23 it wasn't directed toward me. I had -- no questions 24 were directed toward me, so I don't remember 25 specific questions.</p>
<p>1 me. 2 Q. What kind of questions was he asking? 3 A. I can't really recall. 4 Q. Now this wasn't that long ago. 5 A. A year and a half. 6 Q. This seemed like an important meeting. 7 This was an important meeting. 8 A. Not for me. Not for me. I wasn't 9 involved in it, sir. 10 Q. But are you saying that the incident that 11 involved Michael Jenkins and Eddie Parker, where 12 Michael Jenkins was shot in the mouth, it had become 13 a -- you're saying that this was not an important 14 event to you? 15 A. I didn't say it wasn't an important event. 16 I had no involvement, so I didn't really follow the 17 line of questioning since I was not questioned 18 directly. 19 Q. But you -- you helped investigate this 20 incident? 21 A. No sir, I did not. I took Garrity 22 statements and that is all I had to do with that 23 incident, at the direction of the Sheriff. 24 Q. And taking an -- taking an investigative 25 statement, taking a statement is participating in an</p>	<p>Page 87 1 Q. Okay. But do you remember what happened 2 in that meeting with the FBI? 3 A. He sat down and met with us a little while 4 and left. 5 Q. Okay. And do you remember what y'all 6 talked about? 7 A. No, not the particulars. 8 Q. Okay. Do you have any records from that 9 meeting? 10 A. No. 11 Q. So why are you taking offense to that 12 question? 13 A. I don't -- 14 MR. DARE: Counsel, if you've got a 15 question, you can ask a question. I think the -- I 16 think the witness is just getting frustrated by you 17 repeatedly asking the same question over and over 18 and over again. So if you've got a question, ask 19 your question and let's move on. 20 MR. SHABAZZ: No, no, no. I haven't asked 21 over and over again. I'm just getting to what 22 happened in a critical FBI meeting, and I'm just 23 getting into that. I think I'm getting my non- 24 answer, okay. Okay. 25 BY MR. SHABAZZ:</p>
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90 to 93

<p style="text-align: right;">Page 90</p> <p>1 Q. What happened in -- what were the other 2 meetings that you participated in after the Jenkins- 3 Parker incident? 4 A. I did not attend any specific -- any 5 specified meeting about that case, to the best of my 6 recollection. Again, it would come up in staff 7 meetings, which we held every day. 8 Q. Okay. And when it came up in the staff 9 meetings, what was discussed? 10 A. Just what was going on, what they had 11 heard. 12 Q. Okay. The officers that I've been talking 13 about, Dedmon, Middleton, McAlpin, Opdyke and 14 Elward, they continued on at the Sheriff's 15 Department, didn't they? 16 A. I think they were suspended. 17 Q. Okay. Could you tell me what happened to 18 them? 19 A. They were suspended. 20 Q. Okay. When? Which? Can you -- what 21 about Dedmon. Tell me what happened with Mr. 22 Dedmon? 23 A. Don't know. I mean they were suspended 24 and weren't allowed -- didn't come to work, to the 25 best of my knowledge.</p>	<p style="text-align: right;">Page 92</p> <p>1 A. Again, no. Shortly after the incident. 2 Q. We're getting a little closer now -- 3 A. Shortly after the incident. 4 Q. Is that -- you say "shortly after" for 5 Middleton? 6 A. Shortly. 7 Q. And what about Brett McAlpin? 8 A. Shortly after. 9 Q. Okay. Deputy Opdyke? 10 A. Shortly after. 11 Q. And Deputy Elward? 12 A. Shortly after. 13 Q. Okay. And did you participate in their 14 suspensions? 15 A. No, sir. 16 Q. Okay. Well, what -- as the SRT 17 supervisor, what role did you play in these 18 officers' -- in their suspension? 19 A. None. 20 Q. Okay. Let me go back here to -- okay. So 21 Allen Smith. Allen Smith, did you investigate his 22 claims? 23 A. I think I answered that once, but no. 24 Q. No, okay. 25 A. Don't even know the incident.</p>
<p style="text-align: right;">Page 91</p> <p>1 Q. Okay. When was Dedmon suspended? 2 A. I don't know. 3 Q. He was on your SRT team; correct? 4 A. Yes, sir. 5 Q. Do you recall when he was suspended? 6 A. No, sir. Shortly after the incident. Any 7 OIS, generally the deputies involved are suspended 8 until the MBI investigation comes back, in general. 9 Q. Now tell me -- can you explain OIS, 10 please? 11 A. Officer-involved shooting. 12 Q. Okay. Okay. So Dedmon. What about Mr. 13 Middleton? He was on your SRT team? 14 A. Yes. 15 Q. When was he -- okay. When -- 16 A. Again, I can't give you a date. 17 Q. Now you're the supervisor, right? 18 A. No, sir. 19 Q. Of the SRT? 20 A. I run the SRT team. 21 Q. Isn't he a team member? 22 A. Yes, sir. 23 Q. Middleton is a team member, right? 24 A. Yes, sir. 25 Q. And do you recall when he was suspended?</p>	<p style="text-align: right;">Page 93</p> <p>1 Q. You don't even know it? 2 A. No, sir. Not unless you can again give me 3 some details where this thing happened. I might 4 have a recollection of a passing conversation. 5 Q. Okay. In the case where Rankin deputies, 6 these members of the night shift who are called the 7 Goon Squad, where they pled guilty, part of their 8 guilty pleas were not only the actions that they 9 conducted against Jenkins and Parker, but it also 10 includes the actions that they took against Allen 11 Schmidt (sic), which includes Dedmon shooting the 12 gun off near his head and them committing a number 13 of constitutional violations against Mr. Schmidt on 14 the side of a road and -- 15 A. Okay, yeah. Now I know what you're 16 talking about. 17 Q. Are you familiar with that case? 18 A. Heard little snippets here and there. 19 Q. Okay. But did you -- did you investigate 20 that? 21 A. No. No, sir. 22 Q. Do you know who -- do you know who did? 23 A. No, sir. 24 Q. Okay. When was the first time you heard 25 about Allen Schmidt?</p>

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94 to 97

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1 A. Probably would have been after the
2 shooting.
3 MR. WALKER: Which shooting?
4 MR. DARE: The Jenkins-Parker.
5 THE DEPONENT: The Jenkins shooting.
6 BY MR. SHABAZZ:
7 Q. Are you sure it was after?
8 A. No, I'm not sure. To the best of my
9 recollection.
10 Q. It could have been -- it could have been
11 before?
12 A. To the best of my recollection, it could
13 have been, yes.
14 Q. Okay.
15 A. I don't think it was, though.
16 Q. Okay. What about -- let me ask you about
17 a couple of others during your tenure.
18 A. Okay.
19 Q. Samuel Carter. Are you familiar with him?
20 A. Details?
21 Q. Sir?
22 A. Details? What, when, where?
23 Q. Well, in June of 2026, he alleges specific
24 abuses by Rankin deputies who were members of your
25 SRT team.

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1 MR. WALKER: June of '18.
2 MR. DARE: Yeah. 2026 hasn't happened
3 yet.
4 BY MR. SHABAZZ:
5 Q. Sorry. 2016. Sorry.
6 A. Okay.
7 Q. 2016 of June, Samuel Carter alleges abuses
8 by the Rankin County Sheriff's Department against
9 him -- against him, and this involves certain
10 members of your SRT team.
11 A. Okay. Was it an SRT operation?
12 Q. I don't think so.
13 A. Well then I wouldn't know about it.
14 MR. DARE: And counsel, if you could help,
15 when did he -- when did he allege those?
16 MR. SHABAZZ: I said June 2016.
17 MR. DARE: No. But like when did he bring
18 those allegations?
19 MR. SHABAZZ: That's not my question.
20 That's not the question I'm going to ask.
21 MR. DARE: Oh, I know. I was going to say
22 if this might help refresh the witness's
23 recollection. I apologize. You can ask what you
24 want to.
25 MR. SHABAZZ: Let me ask -- let me ask --

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1 that's okay.
2 BY MR. SHABAZZ:
3 Q. Let me ask you this. Were all of the --
4 you said roughly in your tenure, you investigated --
5 you conducted about ten investigations, is that
6 right?
7 A. Roughly, maybe yeah.
8 Q. Okay. Were all of them involving SRT
9 operations or --
10 A. No.
11 Q. Okay. So, okay. So you wouldn't -- some
12 of them did not involve SRT investigations?
13 A. I don't think any of them involved SRT
14 operations, to the best of my recollection.
15 Q. Okay. Okay. So, okay. So are you
16 familiar with Mr. Rick Loveday?
17 A. Not by name. If you can again relate what
18 supposedly happened.
19 Q. I'll come back to that. Let me just ask
20 you about these names. See if they ring a -- see if
21 they're one of the -- some of the ten that you
22 investigated.
23 A. I can just about assure you there are
24 none.
25 MR. WALKER: I need to go off the record.

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1 MR. DARE: Okay. Hey, we're going to go
2 off the record for a sec.
3 THE REPORTER: We are off the record. The
4 time now is 12:16 p.m.
5 (WHEREUPON, a recess was taken.)
6 THE REPORTER: The time now is 12:25 p.m.,
7 and we are back on record.
8 BY MR. SHABAZZ:
9 Q. All right. Okay. Thank you for your
10 patience and cooperation. You've been very helpful
11 today. Okay. So I want to ask you, did you -- did
12 you ever read the New York Times or Mississippi
13 Today article on the Rankin County Goon Squad?
14 A. Yes. I read that. I think the Times.
15 Q. And you read the article?
16 A. Uh-huh.
17 Q. Okay. And when you read that article,
18 which alleges extensive actions of deputies in the
19 Rankin Sheriff's Department, some of which were
20 under your direct command in SRT, what did you think
21 when you read the New York Times article?
22 MR. DARE: I'm going to object. One on
23 hearsay, two on this witness is here to provide
24 facts as per your notice, and not opinions.
25 MR. SHABAZZ: Okay. What was your

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98 to 101

<p style="text-align: right;">Page 98</p> <p>1 response when you read the New York Times article on</p> <p>2 the Rankin County deputies and the Goon Squad?</p> <p>3 MR. DARE: Same objection. You can</p> <p>4 answer.</p> <p>5 THE DEPONENT: I can answer? I was</p> <p>6 devastated.</p> <p>7 BY MR. SHABAZZ:</p> <p>8 Q. Okay. And why was that?</p> <p>9 A. I'm 71. I was 69 and 70 during that time.</p> <p>10 Opdyke, Elward and a couple of those kids were young</p> <p>11 enough to be my children. I trusted them, I loved</p> <p>12 them and they just broke my heart.</p> <p>13 Q. Okay. Well I mean -- were you shocked</p> <p>14 that all of this could have been occurring while you</p> <p>15 were in supervisory position in the department?</p> <p>16 A. Again, I didn't supervise them on the</p> <p>17 shift. Only on SRT operations. But it just was</p> <p>18 terrible.</p> <p>19 Q. Okay. But were you surprised this had</p> <p>20 been occurring in the Rankin Sheriff's Department?</p> <p>21 MR. DARE: Object to form.</p> <p>22 THE DEPONENT: I don't know how you</p> <p>23 couldn't be that.</p> <p>24 THE REPORTER: Will you repeat your</p> <p>25 answer?</p>	<p style="text-align: right;">Page 100</p> <p>1 that he does not have to provide any opinions if he</p> <p>2 does not so choose. I would also note that counsel</p> <p>3 knows that this is not an expert deposition.</p> <p>4 MR. SHABAZZ: I can ask about the article.</p> <p>5 BY MR. SHABAZZ:</p> <p>6 Q. Okay. So you said you were surprised?</p> <p>7 A. Absolutely.</p> <p>8 Q. Okay and --</p> <p>9 A. Disappointed's more the proper word,</p> <p>10 probably.</p> <p>11 Q. Why was that?</p> <p>12 A. I was disappointed in them. You just</p> <p>13 don't do those things.</p> <p>14 Q. Okay. Now were you surprised that -- well</p> <p>15 first of all, were you -- were you -- in the New</p> <p>16 York Times article, were you aware of any of the</p> <p>17 allegations that came out in that article?</p> <p>18 A. Yeah. What? I don't understand what</p> <p>19 you're asking now.</p> <p>20 Q. Outside of Michael Jenkins and Eddie</p> <p>21 Parker, that article named a number of incidents</p> <p>22 that have been alleged against Rankin County</p> <p>23 deputies over the years.</p> <p>24 A. I'm not -- I'm not personally familiar</p> <p>25 with them. I mean in the line of work we're in, you</p>
<p style="text-align: right;">Page 99</p> <p>1 THE DEPONENT: I don't know how you could</p> <p>2 not be surprised. I was devastated.</p> <p>3 MR. SHABAZZ: Okay. And if that was true,</p> <p>4 how could all of this have occurred if the Rankin</p> <p>5 County Sheriff's Department was being properly</p> <p>6 supervised?</p> <p>7 MR. DARE: Object to form. Now you're</p> <p>8 getting into absolute opinions. This witness is</p> <p>9 here to testify about facts. If you've got a</p> <p>10 question about facts going on at the time, you can</p> <p>11 ask it.</p> <p>12 MR. SHABAZZ: Oh, I can ask any -- I can</p> <p>13 ask.</p> <p>14 MR. DARE: This witness does not have to</p> <p>15 provide you any opinion.</p> <p>16 MR. SHABAZZ: You can make -- you can make</p> <p>17 your objection, but he can answer that question.</p> <p>18 MR. DARE: And I will say --</p> <p>19 MR. DARE: You've made your objection.</p> <p>20 Answer that question.</p> <p>21 THE REPORTER: One at a -- one at a time</p> <p>22 please, so I can report properly.</p> <p>23 MR. DARE: The witness does not have to</p> <p>24 provide any opinions. I am not instructing the</p> <p>25 witness not to answer, but I am objecting and saying</p>	<p style="text-align: right;">Page 101</p> <p>1 get a lot of allegations. Most people who end up</p> <p>2 going to jail have an allegation of innocence.</p> <p>3 Q. Right. But these were allegations of</p> <p>4 torture and abuse by Rankin deputies?</p> <p>5 A. I don't remember any torture and abuse</p> <p>6 allegations.</p> <p>7 Q. Do you remember that in the article?</p> <p>8 A. Basically, yes I read it.</p> <p>9 Q. Okay. So you -- even in the article,</p> <p>10 there were -- there were many things alleged against</p> <p>11 the deputies that are similar to what in the Jenkins</p> <p>12 and Parker?</p> <p>13 MR. DARE: Object to form.</p> <p>14 BY MR. SHABAZZ:</p> <p>15 Q. I mean, did you read that?</p> <p>16 A. I read the article, sir. Third time I've</p> <p>17 answered it.</p> <p>18 Q. Okay, and when you looked back at your</p> <p>19 position in the department, how do you -- how do you</p> <p>20 -- did you ask yourself how did I miss all of this</p> <p>21 while I was in the department?</p> <p>22 MR. DARE: Object to form. Same</p> <p>23 objection. Go ahead. I mean if you can answer, you</p> <p>24 can answer. Again, doesn't have to provide any</p> <p>25 opinions.</p>

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102 to 105

<p>Page 102</p> <p>1 MR. SHABAZZ: Okay.</p> <p>2 BY MR. SHABAZZ:</p> <p>3 Q. When you read that article, when you read</p> <p>4 that, did you look back and assess your own job</p> <p>5 performance?</p> <p>6 A. No, no. These guys knew what -- no.</p> <p>7 These guys what -- these guys knew what they did was</p> <p>8 wrong.</p> <p>9 Q. Okay. But how come you didn't find out?</p> <p>10 A. Because I didn't follow them around at</p> <p>11 night. Was not my job. I trusted these kids.</p> <p>12 Q. Okay. Did you supervise them properly?</p> <p>13 A. I was not their supervisor. Only on SRT</p> <p>14 operations did I manage them.</p> <p>15 Q. Okay. Did the Rankin County Sheriff's</p> <p>16 Department supervise them properly?</p> <p>17 MR. DARE: Object to form again. I think</p> <p>18 he's answered as to the facts as he knows them.</p> <p>19 MR. SHABAZZ: I got that. Objection</p> <p>20 noted. Did the Rankin County Sheriff's Department</p> <p>21 properly supervise these deputies?</p> <p>22 MR. DARE: And again, that's an opinion</p> <p>23 question that I -- I'm not going to instruct the</p> <p>24 witness not to answer, but he's not required to.</p> <p>25 BY MR. SHABAZZ:</p>	<p>Page 104</p> <p>1 in that article, how could those deputies have</p> <p>2 gotten away with what they got away with in that</p> <p>3 department?</p> <p>4 A. Sounds like they didn't get away with</p> <p>5 anything, I don't think.</p> <p>6 Q. Okay. But what about all the -- what</p> <p>7 about the numerous other allegations in that</p> <p>8 article?</p> <p>9 MR. DARE: That's not a question.</p> <p>10 THE DEPONENT: I'm not familiar with them.</p> <p>11 BY MR. SHABAZZ:</p> <p>12 Q. But you read the article, right?</p> <p>13 A. Fourth time, yes.</p> <p>14 Q. Okay. So I mean this is a simple</p> <p>15 question. I mean a simple question.</p> <p>16 A. I'm not familiar with the individual</p> <p>17 incidents. I cannot put a lot of stock in many</p> <p>18 allegations made against law enforcement in general.</p> <p>19 I was in law enforcement for 48 years. A lot of</p> <p>20 allegations.</p> <p>21 As you know as a defense counsel, one of</p> <p>22 the first things you do is take focus off of the</p> <p>23 defendant and put it on the law enforcement. So I'm</p> <p>24 a cop. I'm sorry.</p> <p>25 Q. Okay. So you said you don't take a lot of</p>
<p>Page 103</p> <p>1 Q. Sir, you have to answer the question sir.</p> <p>2 A. Ask the question.</p> <p>3 Q. Did the Rankin County Sheriff's Department</p> <p>4 properly supervise the deputies that you read about,</p> <p>5 that committed these alleged actions in that New</p> <p>6 York Times article that you read?</p> <p>7 MR. DARE: All right. So he can answer</p> <p>8 the question whether he did. You're asking him his</p> <p>9 opinion on whether Rankin County did anything else,</p> <p>10 even though he may not have knowledge of what's --</p> <p>11 other supervision. And that is why I'm repeatedly</p> <p>12 objecting here, because I don't think your question</p> <p>13 is proper. But again, I'm going to let -- I'm not --</p> <p>14 -- I'm going to let him answer the question, even</p> <p>15 though it is improper and based off of hearsay.</p> <p>16 MR. SHABAZZ: I got you.</p> <p>17 BY MR. SHABAZZ:</p> <p>18 Q. Go right ahead, sir.</p> <p>19 A. I don't know.</p> <p>20 Q. I believe you do know. You were working</p> <p>21 there.</p> <p>22 MR. DARE: Asked and answered,</p> <p>23 argumentative. You don't have to answer again.</p> <p>24 BY MR. SHABAZZ:</p> <p>25 Q. How could -- if those allegations are true</p>	<p>Page 105</p> <p>1 stock in allegations against police officers? Is</p> <p>2 that what you said?</p> <p>3 A. They're always to me require further</p> <p>4 investigation.</p> <p>5 Q. Okay. All right. So the people that I'm</p> <p>6 talking about are in that article. That's why I</p> <p>7 asked, because when you said --</p> <p>8 A. Again, I don't know the specifics of each</p> <p>9 -- I have no knowledge of what happened, what the</p> <p>10 investigations found. It's the New York Times,</p> <p>11 boss.</p> <p>12 Q. I mean I understand that. But I just want</p> <p>13 to know were they part of these ten investigations?</p> <p>14 A. No. I've answered that at least a dozen</p> <p>15 times. No. I had no personal knowledge, nor did I</p> <p>16 investigate these incidents.</p> <p>17 Q. Well, you say you've investigated ten.</p> <p>18 You investigated ten.</p> <p>19 A. I said "maybe."</p> <p>20 Q. You say you can't even name the ten.</p> <p>21 A. Give me details.</p> <p>22 Q. I'm talking about which ten.</p> <p>23 MR. DARE: And I think he's answered the</p> <p>24 question to the best of your ability. He has</p> <p>25 answered the question now, I can't even tell you how</p>